

**ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.**

875 Third Avenue
New York, New York 10022
Fred B. Ringel

Clement Yee

*Attorneys for the Debtor and Debtor in
Possession*

Hearing Date and Time:
March 29, 2022 at 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

286 RIDER AVE ACQUISITION LLC,

Case No: 21-11298 (LGB)

Debtor.

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**FINAL APPLICATION OF ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C. AS ATTORNEYS FOR THE DEBTOR FOR AN AWARD
OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED**

TO THE HONORABLE LISA G. BECKERMAN,
UNITED STATES BANKRUPTCY JUDGE:

Robinson Brog Leinwand Greene Genovese & Gluck P.C., (“Robinson Brog” or “Applicant”), attorneys for 286 Rider Ave Acquisition LLC, as a debtor and debtor in possession in the above-captioned case (“Debtor”), for its final application (the “Application”) pursuant to sections 330(a) and 331 of title 11 of the United States Code (“Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), seek the entry of an order for (a) allowance of compensation for professional services performed by Robinson Brog in the amount of \$610,472.00 and reimbursement of actual and necessary expenses in the amount of \$9,086.96 incurred for the period from October 16, 2021 through March

11, 2022 (the “Second Fee Period”)¹ and (b) final allowance and approval of compensation for professional services provided in the aggregate amount of \$907,768.50 and reimbursement of actual and necessary expenses in the amount of \$13,431.36 that Robinson Brog incurred for the period from July 15, 2021 through and including March 11, 2022 (together, “Compensation Period”) for a total of \$921,199.86. Additionally, Robinson Brog also requests a reserve for estimated fees through April 15, 2022 in the amount of \$35,000. In support of this Application, Robinson Brog respectfully represents:

**SUMMARY OF PROFESSIONAL COMPENSATION AND
REIMBURSEMENT OF EXPENSES REQUESTED**

1. This Application has been prepared in accordance with the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. §330 (the “Guidelines”), and the Order authorizing the retention of Robinson Brog as counsel to the Debtor in this case dated August 4, 2021 (ECF Doc. 16). A certification attesting to compliance with the Guidelines is annexed hereto as **Exhibit A**.

2. Applicant previously filed an application for interim compensation (“Interim Fee Application”) covering the period from the July 15, 2021 to October 15, 2021 (“Interim Compensation Period”), which was filed with the Court on October 26, 2021 (ECF Doc. 102). Applicant’s Interim Fee Application sought fees and expenses in the aggregate amount of \$301,640.90, which consisted of an interim

¹ Pursuant to the Order Regarding Development’s Motion to Confirm Disputed Payoff Amounts, Satisfaction of DIP Loan, and for Related Relief and Supplement to Same, as amended, Robinson Brog’s final fee application was to provide for fees and expenses incurred through February 10, 2022 and an estimate of fees through and including April 15, 2022. However, since this Application is being filed on March 18, 2022, Applicant’s actual fee and expense records through March 11, 2022 are available and it has filed its application on that basis.

fee request of \$297,296.50 and expense reimbursement of \$4,344.40 incurred during the Interim Compensation Period. On November 18, 2021, the Court entered an order (“Interim Compensation Order”) (ECF Doc. 161) approving, on an interim basis, 100% of the fees requested and allowing 80% of the requested fees to be paid but holding back the remaining 20%. The Applicant now seeks as part of this Application final approval of the 20% in fees held back under the Interim Compensation Order.

3. Robinson Brog has received no promises of payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application other than the retainer in the aggregate amount of \$51,738.00 it received when it was initially engaged, of which \$29,158.90 was applied prepetition, leaving Robinson Brog with a postpetition retainer of \$29,158.90. There is no agreement or understanding between Robinson Brog and any other person, other than members of the firm, for the sharing of compensation to be received for services rendered in this case.

4. Copies of the Applicant’s Interim Fee Application and this Court’s Interim Compensation Order are located at ECF Doc. 102 and 161, respectively, and are incorporated herein by reference.

5. Additionally, during the Second Fee Period, pursuant to the Order on Debtor’s Motion to Establish Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered on May 9, 2019 (ECF Doc. No. 64) (the “Interim Compensation Order”), Robinson Brog filed monthly fee statements from the commencement of the Debtor’s case. Pursuant to the Interim

Compensation Order, Robinson Brog has received \$402,515.62 in fees (representing approximately 75%² of the fees requested) and \$6,969.40 in expenses based on its monthly fee statements. Accordingly, pursuant to this Application, Robinson Brog is requesting payment of the remaining holdback accrued under the Interim Compensation Order.

6. Robinson Brog seeks final allowance of (a) \$297,296.50 in fees (including payment of \$59,459.30 holdback) and \$4,344.40 in expenses incurred during the Interim Fee Period and (b) \$610,472.00 fees and \$9,086.96 in expenses incurred during the Second Fee Period for final compensation for professional services rendered to the Debtor during the Compensation Period in the aggregate amount of \$907,768.50, and reimbursement of disbursements in the amount of \$13,431.36 for a total allowance of \$921,199.86 for the period July 15, 2021 through and including March 11, 2022, and after application of the remaining \$29,158.90 retainer, total payment of \$892,040.96. During the Compensation Period, Robinson Brog attorneys and paraprofessionals expended a total of 1,627.5 hours for which compensation is sought. In addition to the fees and expenses actually incurred during the Compensation Period, Robinson Brog estimates additional fees through April 15, 2022 to be approximately \$35,000.

7. The fees charged by Robinson Brog in this case are billed in accordance with its existing billing rates and procedures in effect during the Compensation Period. The rates Robinson Brog charges for the services rendered by its

² Although the Interim Compensation Order provides for interim payments of eighty (80%) percent of monthly fees and one hundred (100%) percent of monthly expenses, due to cash constraints, the Debtor was unable to pay the Robinson Brog the full amounts payable under the Interim Compensation Order during the case.

professionals and paraprofessionals in these chapter 11 cases are the same rates Robinson Brog charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable nonbankruptcy cases in a competitive legal market.

8. Pursuant to the Guidelines, annexed hereto as Exhibit B is a schedule setting forth all Robinson Brog professionals and paraprofessionals who have performed services in this chapter 11 case during the Compensation Period, the capacities in which each such individual is employed by Robinson Brog, the hourly billing rate charged by Robinson Brog for services performed by such individual, the year in which each professional was first licensed to practice law and the aggregate number of hours expended and fees billed therefor.

9. Annexed to this Application as Exhibit C is a schedule specifying the categories of expenses for which Robinson Brog is seeking reimbursement and the total amount for each such expense category.

10. Pursuant to Section II.D of the Guidelines, annexed to this Application as Exhibit D is a summary of Robinson Brog's time records billed during the Compensation Period, including the utilization of project categories as hereinafter described in this case.³

11. Robinson Brog maintains computerized records of the time spent by all Robinson Brog attorneys and paraprofessionals in connection with the prosecution of the Debtor's chapter 11 case. Subject to redaction or modification for the

³ A limited number of entries on the invoices have been redacted to cover material that is protected by privilege for ongoing litigation. A motion to seal is being separately filed in connection with the redacted records.

attorney-client privilege where necessary to protect the Debtor's estate, copies of these computerized records have been furnished to the Court and the United States Trustee for the Southern District of New York ("U.S. Trustee") in the format specified by the Guidelines and are annexed hereto as **Exhibit E**.

12. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Compensation Period but were not processed prior to the preparation of the Application, Robinson Brog reserves the right to request additional compensation for such services and reimbursement of such expenses.

BACKGROUND

13. The Debtor is the owner of the real property located at 286 Rider Avenue, Bronx, New York ("Property"). The Property is subject to a note and mortgage held by Be-Aviv 286 Rider LLC ("Be-Aviv"), which have since matured. The Debtor was in the process of pursuing a plan of reorganization that was premised on the sale of the Property pursuant to Court-approved bid procedures, however, 286 Rider Ave Development LLC ("Development") is seeking this Court's authority to pay off all of the Debtor's claims and dismiss the Debtor's chapter 11 case. Pursuant to various orders of this Court, the auction for the Property and confirmation of the Debtor's plan has been adjourned.

14. In order to determine the allowed professional fees of Robinson Brog, and pursuant to the Court's Order Regarding Development's Motion to Confirm Disputed Payoff Amounts, Satisfaction of DIP Loan, and for Related Relief and Supplement to Same, Robinson Brog is filing this Application.

SUMMARY OF SERVICES

15. The services rendered by the Applicant during the first half of the case were identified and described in Applicant's Interim Fee Application which covers the period from July 15, 2021 to October 15, 2021 in detail. The Applicant's Interim Fee Application was filed as ECF Doc. 102 and is incorporated herein. This Final Application will not repeat the contents of the Interim Fee Application and addresses the services performed during the chapter 11 case during the Second Fee Period from October 16, 2021 through March 11, 2022.

16. As explained in more detail in the Interim Fee Application, the Debtor spent its first three months in chapter 11 defending the propriety of its chapter 11 petition and gathering the necessary information to complete its schedules and statement of financial affairs in an effort to move its case forward. Once it obtained the necessary information, the Debtor was able to file its schedules and statement of financial affairs (ECF Doc. 97, 98). Having filed its schedules and statement of financial affairs, the Debtor was able to expeditiously file (a) a bar date application, which was served on notice to all parties (ECF Doc. 98, 100), (b) an application to employ Rosewood Realty Group as its real estate broker (ECF Doc. 99), (c) a motion to approve DIP financing so the Debtor could fund its bankruptcy case (ECF Doc. 101), (d) the Interim Fee Application, and (e) a motion to extend its exclusive period to file a plan (ECF Doc. 110), all of which were approved over the objection of Development.

17. Consistent with their actions during the Interim Fee Period, Development continued its pattern of objecting to routine motions filed by the

Debtor as well as repeatedly seeking relief in the form of dismissal of the Debtor's case through various motions filed with the Court. Development filed (a) a motion to terminate exclusivity (ECF Doc. 87); motion to appoint an operating trustee (ECF Doc. 92); a second motion to dismiss "based on new evidence" (ECF Doc. 111); an objection to Robinson Brog's retention (ECF Doc. 144); and objections to each and every motion filed by the Debtor, even its application for a bar date. Most, if not all of Development's motions and objections were joined by 286 Rider Associates, LLC, a judgment creditor. As was the case during the Interim Fee Period, Robinson Brog on behalf of the Debtor and the Debtor were obligated to prepare comprehensive responses and objections to each pleading filed by Development as well as prepare for and participate in multiple contested hearings before this Court. A review of the ECF docket evidences the volume of pleadings filed by Development throughout this chapter 11 case.

18. Despite Development's best efforts to frustrate the Debtor's chapter 11 case, each of Development's motions were denied and each of Development's objections were overruled. Ultimately, the Debtor's DIP financing was approved, Rosewood Realty was retained as the Debtor's real estate broker, the Interim Fee Application was approved, and the Debtor's exclusivity and solicitation period were extended.

19. At the same time that Robinson Brog was defending the Debtor's positions to the Court, Robinson Brog was preparing the Debtor's motion to approve bid procedures which was filed on November 23, 2021 (ECF Doc. 173). The bid procedures were approved over Development's objection and the Debtor was then

subsequently able to file its plan of reorganization (“Plan” as amended) and disclosure statement (“Disclosure Statement” as amended) (ECF Doc. 204, 205) and seek a combined hearing to consider their approval (ECF Doc. 206). After amending the Plan and Disclosure Statement, the Disclosure Statement was conditionally approved and the Debtor moved forward with Rosewood’s marketing for the intended sale of the Property. The Debtor and Rosewood’s marketing efforts resulted in the Debtor selecting the Vaja Group as a stalking horse bidder for the Property who executed a contract to purchase the Property for \$10,500,000, subject to this Court’s approval. Notice of the stalking horse contract was filed on January 10, 2022 (ECF Doc. 255), however, Development’s interference in the sale process and the attendant delay resulted in the Vaja Group requesting the return of its \$1,050,000 deposit, which was granted by order of the Court.

20. While the Debtor attempted to move forward with confirmation of the Plan and a sale of the Property, Development filed its motion seeking a structured dismissal of the Debtor’s case (ECF Doc. 171) followed by additional pleadings and supplements to determine payoffs amounts for Be-Aviv. The structured dismissal motion was opposed not only by the Debtor, but by Be-Aviv and the United States Trustee. A series of pleadings were filed and hearings were subsequently held in order to determine Development’s path and intent with respect to any structured dismissal, including the payoff of Be-Aviv and the Debtor’s other creditors. Ultimately, the Court issued an order on February 11, 2022 directing the filing of this Application.

21. In addition to the significant motion practice in the chapter 11 case in the Bankruptcy Court, Development also noticed three (3) appeals of orders entered in this Court: (a) an appeal of the Order Denying Motion of 286 Rider Ave Development LLC to Alter or Amend the Judgment under Bankruptcy Rule 9023 and Federal Rule of Civil Procedure 50(e) (ECF Doc. 75) (“Motion to Reconsider Appeal”); (b) an appeal of Order (A) Approving Bid Procedures in Connection With the Sale of the Debtor’s Real Property, (B) Approving Form and Manner of Notice of Sale, and (C) Scheduling Auction (ECF Doc. 209) (“Bid Procedures Appeal”); and (c) an appeal of Order Denying Motion for Entry of an Order Pursuant to Sections 105(a), 363, 364, 305(a), 349(b) and 1112(b) of the Bankruptcy Code Payoff of Lender Through Exit Refinancing, Claims Procedures, Dismissal of This Bankruptcy Case, and Related Relief (ECF Doc. 210) (“Structured Dismissal Appeal”).

22. With respect to the Motion to Reconsider Appeal, Robinson Brog prepared and filed the Debtor’s Counter Statement of Issues on Appeal and Designation of Additional Items to Be Included in Record on Appeal (ECF Doc. 115). The Motion to Reconsider Appeal included the drafting of a number of letters regarding Development’s attempt to expand the record to include additional documents into the record and its request for an expedited briefing schedule. The District Court granted Development’s request for an expedited briefing schedule and in response Robinson Brog prepared its appellate brief in opposition to the Motion to Reconsider Appeal as well an appendix of documents to be considered by the District Court. The Motion to Reconsider Appeal was argued in the District

Court and thereafter the District Court remanded the matter to the Bankruptcy Court to consider the additional materials Development sought to include in the appellate record. The Bankruptcy Court has scheduled a hearing on the remand for March 25, 2022 at 2:00 p.m.

23. With respect to the Bid Procedures Appeal, Robinson Brog also prepared the Debtor's Counter Statement of the Issues on Appeal and Designation of additional Items to Be Included in Record of Appeal. At this juncture, according to the ECF docket, the Bid Procedures Appeal has not been transmitted to the District Court.

24. With respect to the Structured Dismissal Appeal, Development has not filed any Statement of Issues. Nevertheless, the appeal has not been dismissed by Development.

25. The foregoing narrative sets forth some of the matters addressed by Robinson Brog on the Debtor's behalf during the Compensation Period and the results it obtained on behalf of the Debtor and its estate. There can be no question that Development has turned this case into an extremely litigious case by any standard having filed no less than thirty (30) motions or letters seeking relief from the Court and causing the Debtor to spend time and money responding to Development's affirmative, and in many cases, repetitive, litigation.

26. The following is a summary of the additional professional services rendered by Robinson Brog during the Second Fee Period. Parties in interest are referred to counsel's detailed billing records for the precise entries relating to the work performed during the Compensation Period. The following summary is

organized in accordance with Robinson Brog's internal system of project or work codes. Exhibit D provides a more detailed breakdown of the time devoted and fees allocable to each work code.

(a) Asset Disposition

- Prepared bid procedures and motion to approve bid procedures;
- Negotiated and discussed bid procedures with Rosewood and Be-Aviv;
- Drafted motion to shorten time to approve bid procedures;
- Coordinated with Rosewood regarding marketing and sale issues;
- Reviewed and corresponded with potential bidders; and
- Negotiated stalking horse contract.

(b) Business Operations

- Reviewed budget issues;
- Drafted letters seeking business plans and permits; and
- Drafted letters to potential trespassers at the Property.

(c) Case Administration

- Reviewed deposition transcripts and document productions;
- Filed schedules and statement of financial affairs;
- Filed amended statement of financial affairs;
- Filed and served pleadings
- Reviewed hearing transcripts; and
- Reviewed and filed operating reports.

(d) Claims Administration and Objections

- Reviewed claims; and
- Noticed and submitted bar date application.

(e) Retention Application Preparation & Processing

- Prepared, filed, and noticed application to retain Rosewood; and
- Corresponded with Rosewood regarding objection to retention.

(f) Financing

- Negotiated and drafted DIP loan agreement;
- Drafted DIP order; and
- Drafted, filed motion to approve DIP financing and supporting documents.

(g) Litigation

- Defended motions filed by the Debtor from objections filed by Development and responded to motions filed by Development, including:
 - Debtor's Motion to Set Last Day to File Proofs of Claim (ECF Doc. 98);
 - Debtor's Application to Employ Rosewood Realty Group as Real Estate Broker (ECF Doc. 99);
 - Development's First Motion to Limit Exclusivity and Authorization to file a Plan (ECF Doc. 87);
 - Development's Motion to Appoint Chapter 11 Trustee (ECF Doc. 92);
 - Debtor's Motion of Debtor For Authority to (A) Obtain Postpetition Financing and Utilize Cash Collateral Pursuant to 11 U.S.C. §§ 105, 362, 363, 364(c)(1), 364(d), AND 364(e) and Fed. R. Bankr. P. 2002, 4001(c), 4001(d) and 9014, (B) Granting Adequate Protection to Prepetition Secured Lender, (C) Modifying the Automatic Stay, and (D) Granting Related Relief (ECF Doc No. 101);
 - First Interim Application of Robinson Brog Leinwand Greene Genovese & Gluck P.C., as Attorneys for the Debtor, for Allowance of Compensation for the Debtor, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Actual and Necessary Expenses for the Period July 15, 2021 through October 15, 2021 (ECF Doc. 102);

- Debtor's Motion for Entry of Order Extending Exclusive Right to File a Plan of Reorganization and to Solicit Acceptances to Their Plan and for Related Relief (ECF Doc. 110);
- Development's Motion to Dismiss Case Based on New Evidence (ECF Doc. 111);
- Debtor's Response to Motion of 286 Rider Ave Development LLC for Entry of an Order (I) Terminating, Only as to 286 Rider Ave Development LLC, the Debtor's Exclusive Periods to File a Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code, and (II) authorizing 286 Rider Ave Development LLC to File its Own Plan and Disclosure Statement (ECF Doc. 122)
- Debtor's Objection to Motion of 286 Rider Ave Development LLC for Entry of an Order Pursuant to 11 U.S.C. Section 1104 and Fed. R. Bankr. P. 2007/1 Directing Appointment of Chapter 11 Trustee (ECF Doc. 123);
- Debtor's Objection to Motion of 286 Rider Ave Development LLC, Toby Moskovits and Yechial Michael Lichtenstein to Dismiss Bankruptcy Case Pursuant to 11 U.S.C. §305 or §1112 BASED on New Evidence (ECF Doc. 124);
- Motion to Vacate Retention of Robinson Brog (ECF Doc. 140, 144);
- Debtor's Omnibus Response to 286 Rider Ave Development LLC's Objection to (I) Motion to Extend Plan Exclusivity and Development's Motion to Terminate Plan Exclusivity, (II) Application to Retain Real Estate Broker, (III) Motion to Obtain Post-Petition Financing and Utilize Cash Collateral, (IV) Motion to Fix Bar Date, (V) Robinson Brog's First Interim Fee Application; (VI) Emergency Motion to Vacate Retention of Robinson Brog as Counsel to the Debtor and (VII) Joinders by 286 Rider Associates LLC (ECF Doc. 148);
- Debtor's Declaration in Support of Debtor's Response to 286 Rider Ave Development LLC's Objection to Application to Retain Real Estate Broker (ECF Doc. 150);
- Debtor's Motion for an Order (A) Approving Bid Procedures in Connection With the Sale of the Debtor's Real Property, (B) Approving Form and Manner of Notice, and (C) Scheduling Auction (ECF Doc No. 173);

- Debtor's Motion for Order Shortening Notice on Debtor's Motion for an Order (A) Approving Bid Procedures in Connection With the Sale of the Debtor's Real Property, (B) Approving Form and Manner of Notice, and (C) Scheduling Auction (ECF No. 174);
- Development's Motion for Structured Dismissal and Joinder (ECF Doc. 171, 182);
- Debtor's Response to Motion of 286 Rider Ave Development LLC for Entry of an Order Pursuant to Sections 105(a), 363, 364, 305 (a), 349(b) and 1112(b) of the Bankruptcy Code Authorizing Payoff of Lender Through Exit Refinancing, Claims Procedures, Subsequent Dismissal of this Bankruptcy Case and Related Relief (ECF No. 183);
- Debtor's Reply to Objection and Reservation of Rights of 286 Rider Ave Development LLC, Toby Moskovits and Yechial Michael Lichtenstein to Debtor's Motion for an Order (A) Approving Bid Procedures in Connection With the Sale of the Debtor's Real Property (B) Approving Form and Manner of Notice, and (C) Scheduling Auction (ECF No. 194);
- Debtor's Pro Forma Purchase and Sale Agreement (ECF Doc No. 197);
- Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF Doc No. 204);
- Disclosure Statement for Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF No. 205);
- Debtor's Application for Order (I) Preliminarily Approving Disclosure Statement and (II) Scheduling Hearing on the Debtor's Application for an Order Approving Disclosure Statement and Confirming Debtor's Plan of Reorganization (ECF Doc. 206);
- Debtor's Motion to Establish Procedures for Monthly and Interim Compensation and Reimbursement of Expenses of Professionals (ECF No. 211);
- Debtor's Joinder to Be-Aviv 286 Rider LLC's Motion Under 11 U.S.C. § 105 to Hold Toby Moskovits and Michael Lichtenstein in Contempt for Violating Orders of This Court and for Sanctions (ECF Doc No. 216);
- Development's Motion for Payoff (ECF Doc. 218);

- Development's Second Motion to Limit Exclusivity and file a Plan (ECF Doc. 220);
- Debtor's Supplement to Joinder of 286 Rider Ave Acquisition LLC to Be-Aviv 286 Rider LLC's Motion Under 11 U.S.C. § 105 to Hold Toby Moskovits and Michael Lichtenstein in Contempt for Violating Orders of This Court and for Sanctions (ECF Doc. 224);
- Amended Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF Doc. 228);
- Amended Disclosure Statement for Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF Doc. 229);
- Debtor's Notice of Ballots and Notification of Non-Voting Status for Amended Plan of Reorganization (ECF Doc. 230);
- Debtor's Objection to 286 Rider Ave Development LLC's Motion for Entry of an Order Pursuant to Sections 105(a) and 541 of the Bankruptcy Code Confirming Disputed Payoff Amounts, Satisfaction of DIP Loan, and for Related Relief (ECF Doc. 234);
- Debtor's Response to Renewed Motion of 286 Rider Ave Development LLC, Toby Moskovits and Yechial Michael Lichtenstein (I) Terminating, Only as to Movants, the Debtor's Exclusive Periods to File a Plan and Solicit Acceptances Pursuant to Section 1121 of the Bankruptcy Code, (II) Authorizing Movants to File Their Own Plan and Disclosure Statement; and (III) for Replacement DIP Financing (ECF Doc. 241);
- Amended Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF Doc. 250);
- Amended Disclosure Statement for Plan of Reorganization of 286 Rider Ave Acquisition LLC (ECF Doc. 251);
- Debtor's Stalking Horse Notice (ECF Doc. 255);
- Fee Statement of Robinson Brog Leinwand Greene Genovese & Gluck P.C. For Compensation for Services and Reimbursement of Expenses as Attorneys for the Debtor for the Period from October 16, 2021 to December 31, 2021 (ECF Doc. 256);
- Appellee 286 Rider Ave Acquisition LLC's Counter

Statement of the Issues on Appeal and Designation of Additional Items to Be Included in Record on Appeal (ECF Doc. 262);

- Supplement to Development's Motion to Confirm Disputed Payoff Amounts, Satisfaction of DIP Loan, and for Related Relief (ECF Doc. 272);
 - Supplemental Declaration of Fred B. Ringel Pursuant to (I) Order Approving and Authorizing Retention of Robinson Brog Leinwand Greene Genovese & Gluck P.C. and Bankruptcy Rule 2014 (ECF Doc. 274);
 - Fee Statement of Retention of Robinson Brog Leinwand Greene Genovese & Gluck P.C. for Compensation for Services and Reimbursement of Expenses as Attorneys for the Debtor for the Period from January 1, 2022 to January 31, 2022 (ECF Doc. 280);
 - Motion to Dismiss for Lack of Jurisdiction and Based on Debtor Admissions Pursuant to 11 U.S.C. § 305 or § 1112 (ECF Doc. 290);
 - Motion to Discharge Robinson Brog as Debtor's Counsel Pursuant to 11 U.S.C. §§ 101(14), 105, and 327 (ECF Doc. 299);
 - Debtor's and Lee E. Buchwald's Motion to Reconsider Portion of Court's February 11, 2022 Order Regarding 286 Rider Ave Development, LLC's Motion to Confirm Disputed Pay-Off Amounts, Satisfaction of DIP loan, and for Related Relief and Supplement to Same (ECF Doc. 311);
 - Debtor's and Lee E. Buchwald's Reply to 286 Rider Ave Development, LLC's Omnibus Response to Motion to Reconsider Portion of Court's February 11, 2022 Order Regarding 286 Rider Ave Development, LLC's Motion to Confirm Disputed Pay-Off Amounts, Satisfaction of DIP loan, and for Related Relief and Supplement to Same (ECF Doc. 329);
- Conducted Bankruptcy Rule 2004 examinations of Michael Lichtenstein and of Toby Moskovits;
 - Reviewed transcripts of depositions;
 - Researched and prepared responses to Development motions and objections;

- Drafted contempt motion;
 - Drafted counter-statement of issues and designation of record for appeals;
 - Drafted briefs and prepared exhibits for Motion to Reconsider Appeal; and
 - Prepared for contested hearings.
- (h) Meetings of Creditors/Status Hearings
- Prepared for and attended 341 meeting of creditors; and
 - Attended various telephonic hearings.
- (i) Plan and Disclosure Statement
- Drafted Plan and Disclosure Statement and amendments to same; and
 - Drafted motions to extend exclusivity period.
- (j) Dismissal
- Defended against Development's several motions to dismiss chapter 11 case. Including motion for structured dismissal

27. All of the services for which Robinson Brog seeks compensation herein have been rendered on behalf of the Debtor and were necessary and appropriate to the administration of the Debtor's chapter 11 case. Applicant's services were required on a regular basis in representing the Debtor. The above synopsis of Robinson Brog's representation of the Debtor delineates the general areas of services performed for and on behalf of the Debtor during the Compensation Period. Parties in interest are referred to counsel's detailed billing records for the precise entries relating to the work performed during the Compensation Period. The time records account for the time expended by Robinson Brog in consecutive order by date in six (6) minute increments and within the following specific project billing

sections: Asset Disposition; Business Operations; Case Administration; Claims Administration and Objections; Retention Application Preparation & Processing; Financing; Litigation; Meetings of Creditors/Status Hearings; Plan and Disclosure Statement; and Dismissal.

28. The time records were kept contemporaneously in the ordinary course of Robinson Brog's business during the Compensation Period. The time records detail the amount of time expended by each individual, the nature of services performed and the date of such services in this chapter 11 case. The professional services performed by Robinson Brog on behalf of the Debtor during the Compensation Period required an aggregate expenditure of 4,046.7 recorded hours by Robinson Brog's members, counsel, associates, and paraprofessionals.

29. During the Compensation Period, Robinson Brog billed the Debtor for time expended by attorney's based on hourly rates ranging from \$475.00 to \$800.00 per hour. Allowance of compensation in the amount requested would result in a blended hourly billing rate of approximately \$601.88 for services rendered, which rates compare more than favorably with firms with similar experience in bankruptcy matters. As noted above, annexed hereto is a schedule listing each Robinson Brog professional who performed services in this case during the Compensation Period, the hourly rate charged by Robinson Brog for services performed by each such professional, and the aggregate number of hours charged by each such professional.

ACTUAL AND NECESSARY DISBURSEMENTS OF ROBINSON BROG

30. As set forth in Exhibit C hereto, Robinson Brog has incurred actual and necessary expenses in providing professional services during the Compensation Period and is seeking reimbursement in the amount of \$13,431.36. Robinson Brog's disbursement policies pass through all out of pocket expenses at actual cost or estimated actual cost when the cost is difficult to determine.

THE REQUESTED COMPENSATION SHOULD BE ALLOWED

31. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." *Id.* § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded, the court should consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title;

Id. at § 330(a)(3).

32. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court* (In re Boddy), 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *see also, Shaw, Licitra, Parente, Esernio & Schwartz, P.C. v. Travelers Indemnity Co.* (In re Grant Associates), 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Group, Inc.*, 133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney’s reasonable hourly rate. *See, Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a “strong presumption” that an attorney is entitled to the lodestar fee. *Id.*

33. In the instant case, Robinson Brog respectfully submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Application were necessary and appropriate for and beneficial to the orderly administration of the Debtor’s estate, were in the best interests of the Debtor’s estate, creditors and other parties in interest. Compensation for the foregoing services as requested is commensurate with the complexity, importance

and nature of the problems, issues or tasks involved. The services were performed expeditiously and in an efficient manner and, accordingly, Robinson Brog submits the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Debtor, its estate, and all parties in interest.

34. As this Court is well-aware, the Debtor commenced this case with the simple intention of selling the Property for the benefit of the Debtor and its estate. Robinson Brog, consistent with its fiduciary duties to the Debtor and estate, did everything it could to keep the Debtor on that course. Nevertheless, the Debtor and Robinson Brog were met with resistance at every step of the chapter 11 case, from tasks as simple as the routine and required filing of the Debtor's schedules and setting a bar date, to opposing Development's multiple attempts to dismiss this case, appoint a chapter 11 trustee, and defend three separate appeals. The fees incurred by Applicant in its representation of the Debtor and specifically in responding to Development's persistent attempts to derail this chapter 11 case were necessary and appropriate. Applicant's services on behalf of the Debtor were required in order to preserve and protect the Property and to ensure that the Debtor's estate was not harmed by Development's efforts to wrest control of the case and the Property from the Debtor for its own benefit, to the detriment of other stakeholders and parties in interest.

35. In sum, Robinson Brog submits that the services rendered by Robinson Brog were necessary and beneficial to the Debtor's estate and were consistently performed in a timely manner commensurate with the complexity, importance, and

nature of the issues involved, and approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

CONCLUSION

WHEREFORE, Robinson Brog respectfully requests (i) a final award of compensation for professional services and reimbursement of expenses rendered during the Compensation Period in the amount of \$907,768.50 for fees incurred and \$13,431.36 for the actual and necessary expenses Robinson Brog incurred in the case, (ii) approval of estimated fees from March 12, 2022 through April 15, 2022 in the amount of \$35,000, and (iii) such other and further relief as this Court deems just and proper.

Dated: New York, New York
March 18, 2022

ROBINSON BROG LEINWAND
GREENE GENOVESE & GLUCK P.C.
Attorneys for the Debtor
875 Third Avenue, 9th Floor
New York, New York 10022
Tel. No.: 212-603-6300

By: /s/ Fred B. Ringel
Fred B. Ringel

EXHIBIT A (Certification)

**ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.**

875 Third Avenue

New York, New York 10022

Fred B. Ringel

Clement Yee

*Attorneys for the Debtor and Debtor in
Possession*

Hearing Date and Time:

March 29, 2022 at 10:00 a.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

In re:

Chapter 11

286 RIDER AVE ACQUISITION LLC,

Case No: 21-11298 (LGB)

Debtor.

-----X

**CERTIFICATION UNDER GUIDELINES FOR
FEES AND DISBURSEMENTS FOR PROFESSIONALS
IN RESPECT OF FINAL APPLICATION OF ROBINSON
BROG LEINWAND GREENE GENOVESE & GLUCK P.C. FOR
AWARD OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Fred B. Ringel hereby certifies that:

1. I am a shareholder with the applicant, Robinson Brog Leinwand Greene Genovese & Gluck P.C. ("RBLGGG"), designated with responsibility for the chapter 11 case of 286 Rider Ave Acquisition LLC ("Debtor") in respect of compliance with the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted on January 30, 1996, General Order No. M-447 – Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases and the Order authorizing my firm's retention as counsel to the Debtor in this case.

2. This certification is made in respect of RBLGGG's application, dated March 18, 2022 ("Application"), for a final award of compensation and reimbursement of expenses for the period commencing July 15, 2021 through and including March 11, 2022 ("Application Period") in accordance with the Guidelines.

3. I certify that:

- (a) I have read the Application;
- (b) to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Guidelines;
- (c) the fees and disbursements sought are billed at rates in accordance with those customarily charged by RBLGGG and generally accepted by RBLGGG's clients; and
- (d) in providing a reimbursable service, RBLGGG does not make a profit on that service, whether the service is performed by RBLGGG in-house or through a third party.

4. In respect of section B.2 of the Local Guidelines, I certify that RBLGGG has provided the Debtor or its representative with a statement of fees and disbursements accrued not later than twenty-one (21) days after the end of each month, which included a list of the professionals and others providing services, their respective rates, hours spent by each, a general description of the services rendered and a breakdown of disbursements incurred.

5. The Application is being filed and served in accordance with the Court's Order Regarding Development's Motion to Confirm Disputed Payoff Amounts, Satisfaction of DIP Loan, and for Related Relief and Supplement to Same.

Dated: New York, New York
March 18, 2022

**ROBINSON BROG LEINWAND
GREENE GENOVESE & GLUCK P.C.
Attorneys for the Debtor
875 Third Avenue, 9th Floor
New York, New York 10022
Tel. No.: 212-603-6300**

**By: /s/ Fred B. Ringel
Fred B. Ringel**

EXHIBIT B

PROFESSIONAL SERVICES SUMMARY—INTERIM FEE PERIOD

Name Of Professional	Year Admitted	Hourly Rate	Hours Billed for Interim Fee Period	Total Compensation
Fred B. Ringel, Partner	1986	\$750.00 No Charge	113.2 2.7	\$84,900.00 \$0.00
A. Mitchell Greene, Partner	1979	\$775.00	2.7	\$2,092.50
Steven Eichel, Partner	1988	\$590.00	179.3	\$105,787.00
William A. Rome, Partner	1987	\$550.00	37.6	\$20,680.00
Robert M. Sasloff, Of Counsel	1990	\$545.00	4.1	\$2,234.50
Clement Yee, Associate	2009	\$475.00 No Charge	145.6 2.5	\$69,160.00 \$0.00
Nathanael F. Meyers, Paralegal	N/A	\$250.00 No Charge	43.1 0.8	\$10,775.00 \$0.00
Kiana Harley, Paralegal	N/A	\$250.00	3.8	\$950.00
Farah F. Bayonova, Paralegal	N/A	\$175.00	4.1	\$717.50
Total Fees Requested for Interim Fee Period			539.5	\$297,296.50

PROFESSIONAL SERVICES SUMMARY—SECOND FEE PERIOD

Name Of Professional	Year Admitted	Hourly Rate	Hours Billed for Second Period	Compensation for Second Period
Fred B. Ringel, Partner	1986	\$750.00 \$800.00	191.6 101.4	\$143,700.00 \$81,120.00
A. Mitchell Greene, Partner	1979	\$775.00 \$800.00 No Charge	1.0 2.1 0.9	\$775.00 \$1,680.00 \$0.00
Lori Schwartz	1998	\$570.00 \$600.00 No Charge	150.5 107.3 5.1	\$85,785.00 \$64,380.00 \$0.00
Philip H. Thomas, Partner	1985	\$550.00	2.7	\$1,485.00
Steven Eichel, Partner	1988	\$590.00	150.0	\$88,500.00
Nicholas M. Menasche, Partner	2007	\$475.00	3.5	\$1,662.50
Robert M. Sasloff, Of Counsel	1990	\$545.00 No Charge	0.2 0.7	\$109.00 \$0.00
Clement Yee, Associate	2009	\$475.00 \$495.00 No Charge	177.0 44.9 2.7	\$84,075.00 \$22,225.50 \$0.00
Nathanael F. Meyers, Paralegal	N/A	\$250.00 No Charge	139.9 6.5	\$34,975.00 \$0.00
Total Fees Requested for Second Fee Period			1,088.0	\$610,472.00

EXHIBIT C

EXPENSE SUMMARY – INTERIM FEE PERIOD

EXPENSES	AMOUNTS
Deposition	\$155.03
Postage/Certified Mail	\$4.80
Overnight Deliveries	\$445.91
Messenger	\$38.00
Photocopying	\$576.30
United Lawyers Service	\$10.76
Service of Papers	\$789.00
Outside Professional Services	\$210.00
Transcripts	\$2,114.60
Total Expenses Requested for Interim Fee Period:	\$4,344.40

EXPENSE SUMMARY – SECOND FEE PERIOD

EXPENSES	AMOUNTS
Color Copies	\$161.00
Postage/Certified Mail	\$432.36
Overnight Deliveries	\$2,495.20
Messenger	\$39.10
Photocopying	\$2,631.90
Filing Fees	\$910.00
Corporate Services	\$140.00
Transcripts	\$2,277.40
Total Expenses Requested for Second Fee Period:	\$9,086.96

EXHIBIT D

INTERIM FEE PERIOD COMPENSATION BY WORK TASK

TASK CODE	DESCRIPTION	HOURS	AMOUNT
B001	Asset Disposition	0.5	\$375.00
B002	Business Operations	3.3	\$1,815.00
B003	Case Administration	58.5	\$22,850.00
B004	Claims Administration/ Objections	2.1	\$997.50
B005	Retention Application Preparation & Processing	21.9	\$10,827.50
B006	Financing	12.2	\$6,497.50
B007	Litigation	320.6	\$190,529.00
B008	Meetings of Creditors/Status Hearings	3.4	\$1,615.00
B009	Plan and Disclosure Statement	4.8	\$2,940.00
B010	Relief From Stay Proceedings	4.0	\$1,900.00
B013	Dismissal, Venue, Abstention & Withdrawal	108.2	\$56,950.00
Total Fees Requested for Interim Fee Period:		539.5	\$297,296.50

SECOND FEE PERIOD COMPENSATION BY WORK TASK

TASK CODE	DESCRIPTION	HOURS	AMOUNT
B001	Asset Disposition	60.6	\$37,334.00
B002	Business Operations	3.1	\$2,019.50
B003	Case Administration	133.8	\$45,498.50
B004	Claims Administration/ Objections	16.3	\$7,748.00
B005	Retention Application Preparation & Processing	12.7	\$6,045.50
B006	Financing	49.7	\$27,163.50
B007	Litigation	553.1	\$342,002.50
B008	Meetings of Creditors/Status Hearings	27.5	\$15,930.50
B009	Plan and Disclosure Statement	130.6	\$69,039.50
B013	Dismissal, Venue, Abstention & Withdrawal	100.6	\$57,690.50
Total Fees Requested for Second Fee Period:		999.5	\$610,472.00

Exhibit E for Second Fee Period (Time Sheets)⁴

⁴ Time sheets for First Interim Fee Period are annexed to the Interim Fee Application.

ROBINSON BROG LEINWAND GREENE GENOVESE & GLUCK P.C.

875 THIRD AVENUE, 9TH FLOOR

NEW YORK, NEW YORK 10022-0123

Tel: (212) 603-6300

Fax: (212) 956-2164

Federal Tax ID: 13-2704441

286 RIDER AVE ACQUISITION LLC
C/O BUCHWALD CAPITAL ADVISORS LLC
ATTN: LEE E. BUCHWALD
200 PARK AVENUE, SUITE 1700
NEW YORK, NY 10003

March 17, 2022

Bill Number 190180

File Number 104246.0000

FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 11, 2022

Re: CHAPTER 11

FEES

ASSET DISPOSITION

11/02/21	CY	TELEPHONE CONFERENCE WITH FBR RE BID PROCEDURES.	0.10 Hrs
11/03/21	CY	TELEPHONE CONFERENCE WITH FBR RE BID PROCEDURES.	0.10 Hrs
11/03/21	CY	DRAFT BID PROCEDURES (2.0); DRAFT MOTION TO APPROVE SAME (.6).	2.60 Hrs
11/04/21	CY	REVISE BID PROCEDURES (1.8); TELEPHONE CONFERENCE WITH LS RE SAME (.2); DRAFT MOTION TO APPROVE SAME (1.1).	3.10 Hrs
11/12/21	CY	REVIEW BID PROCEDURES AND MOTION.	0.60 Hrs
11/16/21	CY	REVISE BID PROCEDURES AND MOTION.	0.60 Hrs
11/19/21	CY	TELEPHONE CONFERENCE WITH JM AND FBR RE BID PROCEDURES (1.7); REVISE SAME (.3).	2.00 Hrs
11/19/21	FBR	REVIEW AND REVISE BID PROCEDURES ORDER	1.50 Hrs
11/20/21	CY	REVISE BID PROCEDURES (.9); BID PROCEDURES MOTION (1.0); MOTION TO SHORTEN TIME RE SAME (1.6)	3.50 Hrs
11/22/21	CY	REVISE BID PROCEDURES, MOTION, AND MOTION TO SHORTEN TIME (1.4); CORRESPOND WITH FBR RE SAME (.3).	1.70 Hrs
11/22/21	FBR	PREPARATION OF BID PROCEDURES MOTION(1.4); BID PROCEDURES AND RELATED DOCUMENTS (2.1)	3.50 Hrs
11/23/21	CY	REVISE BID PROCEDURES AND MOTION TO SHORTEN (1.2); CORRESPOND WITH NFM RE FILING AND SERVICE OF SAME (.2); SUBMIT ORDER SHORTENING TIME (.3).	1.70 Hrs
11/23/21	FBR	REVIEW AND REVISE BID PROCEDURES MOTION	1.40 Hrs
11/23/21	FBR	TELEPHONE CONFERENCE WITH CORBIN REGARDING SALE STRATEGY AND 421A ISSUE	0.80 Hrs

Re: CHAPTER 11

11/24/21	FBR	PREPARATION OF EMAIL [REDACTED] [REDACTED]	0.40 Hrs
11/29/21	FBR	TELEPHONE CONFERENCE WITH CORBIN REGARDING SALES PRICES AND TIMING	0.70 Hrs
12/03/21	CY	REVIEW OBJECTION TO BID PROCEDURES.	0.20 Hrs
12/03/21	FBR	PREPARATION OF PRO FORMA PSA FOR BID PROCEDURES MOTION	2.70 Hrs
12/03/21	FBR	TELEPHONE CONFERENCE WITH CORBIN RE TEASER AND OFFERING MEMORANDUM (3XS)	0.50 Hrs
12/03/21	LS	TELEPHONE CONFERENCE WITH FBR 2X RE BID PROCEDURES OBJECTION	0.20 Hrs
12/03/21	LS	REVIEW OBJECTION TO BID PROCEDURES	0.50 Hrs
12/03/21	LS	REVIEW EXECUTIVE SUMMARY/OFFERING MEMO	0.20 Hrs
12/03/21	LS	EMAILS WITH FBR RE BID DEADLINE AND AUCTION DATES AND MARKETING MATERIALS	0.20 Hrs
12/03/21	PHT	REVIEW EMAIL FROM FBR RE FORM OF CONTRACT NEEDED FOR BANKRUPTCY TRANSACTION	0.10 Hrs
12/04/21	PHT	SEARCH DOCUMENT LIBRARY AND REVIEW ALTERNATIVE FORMS OF CONTRACTS FOR SUITABILITY FOR BANKRUPTCY TRANSACTION (.6); EMAIL WITH FBR RE SAME (.2)	0.80 Hrs
12/06/21	FBR	RECEIVED AND REVIEW OF EMAIL FROM CORBIN RE ISSUE WITH TEASER FOR SALE OF PROPERTY	0.40 Hrs
12/06/21	FBR	REVIEW AND REVISE CORBIN DECLARATION TO ACCOMPANY RESPONSE	0.60 Hrs
12/06/21	FBR	TELEPHONE CONFERENCE WITH LORI RE PRELIMINARY DISCUSSION OF RESPONSE FOR BID PROCEDURES OBJECTION	0.40 Hrs
12/06/21	FBR	TELEPHONE CONFERENCE WITH CALL WITH MARTIN JOSEPH AT NOON REGARDING DECLARATION DATED 12.03.2021 AND INQUIRING AS TO STATUS OF PLANS AND WHETHER THEY HAVE BEEN APPROVED BY DOB(0.3); FOLLOW UP EMAIL WITH COPY OF JOSEPH DECLARATION (0.1)	0.40 Hrs
12/06/21	LS	TELEPHONE CONFERENCE WITH FBR RE: OFFERING MEMO	0.30 Hrs
12/06/21	LS	ZOOM CALL WITH [REDACTED] [REDACTED]	0.40 Hrs
12/06/21	LS	TELEPHONE CONFERENCE WITH CY RE BID PROCEDURES, OBJECTION TO BID PROCEDURES	0.20 Hrs
12/06/21	LS	REVIEW OBJECTION TO BID PROCEDURES	0.40 Hrs
12/06/21	LS	REVIEW TRANSCRIPTS OF PRIOR PROCEEDINGS FOR PREP OF OBJECTION TO BID PROCEDURES	0.80 Hrs
12/06/21	LS	PREPARE REPLY TO OBJECTION TO BID PROCEDURES	2.40 Hrs
12/06/21	LS	REVIEW ROSEWOOD TEASER EMAIL	0.10 Hrs
12/06/21	LS	REVIEW METROPOLITAN REALTY EMAILS RE DECLARATION AND BUILDING PLANS	0.30 Hrs

Re: CHAPTER 11

12/06/21	PHT	REVIEW AND REVISE DRAFT PURCHASE AND SALE AGREEMENT (1.5); EMAIL WITH FBR RE SAME (.3)	1.80 Hrs
12/07/21	FBR	REVIEW AND REVISE REPLY TO BID PROCEDURES	1.40 Hrs
12/07/21	FBR	PREPARATION OF DECLARATION REGARDING CALL WITH MARTIN JOSEPH	0.50 Hrs
12/07/21	LS	REVIEW AND REVISE RESPONSE TO OBJECTION TO BID PROCEDURES MOTION	2.20 Hrs
12/07/21	LS	REVIEW OBJECTION TO BID PROCEDURES	0.30 Hrs
12/07/21	LS	REVIEW DECLARATIONS ATTACHED TO RESPONSE TO BID PROCEDURES OBJECTION	0.20 Hrs
12/07/21	LS	PREPARE EXHIBITS TO RESPONSE TO OBJECTION TO BID PROCEDURES	0.20 Hrs
12/07/21	LS	ZOOM CALL WITH FBR AND CY RE BID PROCEDURES OBJECTION AND OMNIBUS REPLY IN SUPPORT OF SDM	0.20 Hrs
12/07/21	LS	REVIEW AND REVISE FBR DECLARATION REGARDING BID PROCEDURES OBJECTION/CONSTRUCTION PLANS/TAX ABATEMENT	0.20 Hrs
12/07/21	LS	EMAILS WITH NFM AND FBR RE SERVING AND FILING DEBTOR RESPONSE TO OBJECTION TO BID PROCEDURES	0.20 Hrs
12/07/21	LS	PREPARE COURTESY COPY OF RESPONSE TO OBJECTION TO BID PROCEDURES FOR CHAMBERS WITH COVER LETTER	0.20 Hrs
12/08/21	CY	REVIEW REPLY TO BID PROCEDURES OBJECTION (.2); FILE FORM APA (.2); SERVE SAME (.2); FILE COS RE SAME (.1).	0.70 Hrs
12/08/21	LS	REVIEW SUPPLEMENTAL DECLARATION OF M. JOSEPH	0.20 Hrs
12/08/21	LS	TELEPHONE CONFERENCE WITH FBR RE PREP FOR HEARING RE BID PROCEDURES AND SDM	0.40 Hrs
12/09/21	FBR	REVIEW AND REVISE BID PROCEDURES	1.20 Hrs
12/09/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.40 Hrs
12/10/21	CY	SUBMIT BID PROCEDURES ORDER.	0.10 Hrs
12/10/21	FBR	REVIEW AND REVISE BID GUIDELINES AND CIRCULATE TO ALL PARTIES	1.10 Hrs
12/10/21	FBR	REVIEW AND REVISE ORDER TO APPROVE BIDDING PROCEDURES AND CIRCULATE TO ALL PARTIES	1.30 Hrs
12/10/21	FBR	PREPARATION OF EMAIL CLEMENT RE SUBMISSION OF ORDER AND REVISED BID PROCEDURES TO JUDGE BECKERMAN	0.20 Hrs
12/13/21	CY	TELEPHONE CONFERENCE WITH FBR RE BID PROCEDURES ORDER.	0.10 Hrs
12/15/21	LS	DISCUSSION WITH NFM RE MAILING BID PROCEDURES ORDER AND SCHEDULING MOTION	0.20 Hrs
12/15/21	NFM	PREPARE AND SERVE SIGNED BID PROCEDURES ORDER	0.50 Hrs
12/16/21	CY	CORRESPOND WITH CORBIN RE CLAIMS.	0.30 Hrs

ROBINSON BROG LEINWAND GREENE GENOVESE & GLUCK P.C.

Re: CHAPTER 11

12/16/21	LS	REVIEW CALENDAR RE BID PROCEDURES, SALE & DIP FINANCING DEADLINES	0.20 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH CORBIN REGARDING STALKING HORSE CANDIDATES AND MECHANICS OF MAKING AN OFFER	0.40 Hrs
12/21/21	FBR	PREPARATION OF EMAIL TO LEE BUCHWALD AND GUY PELEG REGARDING AVAILABILITY FOR CALL WITH CORBIN ON THURSDAY TO DISCUSS STALKING HORSE OFFER	0.30 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH LEE RE CALL WITH CORBIN ON STALKING HORSE ISSUE	0.20 Hrs
12/21/21	LS	REVIEW TRANSCRIPT RE BID PROCEDURES	0.40 Hrs
01/03/22	FBR	TELEPHONE CONFERENCE WITH CORBIN RE SELECTION OF STALKING HORSE AND PHASE II	0.60 Hrs
01/05/22	FBR	TELEPHONE CONFERENCE WITH CORBIN RE BIDDER QUESTION	0.30 Hrs
01/06/22	FBR	REVIEW OF STALKING HORSE CONTRACT MARKUP AND COMMUNICATE WITH CORBIN RE ISSUES	1.20 Hrs
01/07/22	CY	REVIEW DEVELOPMENT BID (.2); CORRESPOND WITH FBR RE SAME (.2).	0.40 Hrs
01/10/22	AMG	TELEPHONE CONFERENCE WITH FRED RE SALE AND BIDDING	0.20 Hrs
01/10/22	CY	CORRESPOND WITH FBR RE STALKING HORSE (.1) REVIEW NOTICE (.5).	0.60 Hrs
01/10/22	FBR	REVIEW OF STALKING HORSE BIDDER DOCUMENTASTION	1.30 Hrs
01/11/22	LS	REVIEW BID PROCEDURES	0.20 Hrs
01/12/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.70 Hrs
01/12/22	LS	REVIEW DEVELOPMENT OBJECTION TO BID PROCEDURES	0.40 Hrs
01/12/22	LS	REVIEW REVISED BID PROCEDURES ATTACHED TO BPO	0.30 Hrs
02/11/22	CY	TELEPHONE CONFERENCE WITH FBR RE STALKING HORSE (.1); DRAFT ORDER RELEASING DEPOSIT (.6).	0.70 Hrs
02/11/22	FBR	TELEPHONE CONFERENCE WITH LEE BUCHWALD REGARDING STALKING HORSE REQUEST FOR RETURN OF DEPOSIT	0.40 Hrs
02/14/22	CY	REVISE ESCROW ORDER (.2); DRAFT LETTER FOR SAME (.3); SUBMIT SAME (.2).	0.70 Hrs
02/15/22	CY	CORRESPOND WITH CHAMBERS RE ESCROW ORDER.	0.10 Hrs
02/16/22	CY	TELEPHONE CONFERENCE WITH CHAMBERS RE ESCROW ORDER.	0.10 Hrs
02/17/22	FBR	REVIEW OF ORDER ON VAJA DEPOSIT AND EMAIL TO COUNSEL RE SAME	0.10 Hrs
02/17/22	FBR	REVIEW OF WIRE TRANSFER FORM AND SIGN OFF ON SAME TO EFFECTUATE RETURN OF DEPOSIT	0.30 Hrs

ASSET DISPOSITION Totals 60.60 Hrs \$37,334.00

Re: CHAPTER 11

BUSINESS OPERATIONS

11/02/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs	
11/03/21	FBR	RECEIVED AND REVIEW OF EMAIL [REDACTED]	0.10 Hrs	
11/03/21	FBR	PREPARATION OF EMAIL LEE RE: CALL TO ARCHITECTS AND ENGINEERS	0.30 Hrs	
11/03/21	FBR	PREPARATION OF EMAIL [REDACTED]	0.20 Hrs	
11/03/21	LS	REVIEW MEMO RE EXERCISING PLEDGE	0.30 Hrs	
11/17/21	FBR	PREPARATION OF EMAIL TO SPELFOGEL RE PAYOFF	0.20 Hrs	
11/30/21	CY	DRAFT LETTER TO VACATE TO ALL ISLAND (.6); CORRESPOND WITH LEE RE SAME (.1)	0.70 Hrs	
12/08/21	LS	REVIEW DIP BUDGET	0.10 Hrs	
12/28/21	LS	REVIEW OPERATING AGREEMENT	0.20 Hrs	
02/09/22	LS	REVIEW NYC.GOV RE OUTSTANDING TAX BILL	0.20 Hrs	
03/10/22	FBR	TELEPHONE CONFERENCE WITH BUCHWALD RE DEVELOPMENTS CHANGING OF LOCKS	0.50 Hrs	
BUSINESS OPERATIONS Totals			3.10 Hrs	\$2,019.50

CASE ADMINISTRATION

10/18/21	CY	CORRESPOND WITH SE RE SCHEDULES.	0.10 Hrs	
10/18/21	LS	TELEPHONE CONFERENCE WITH CY RE STRATEGY & 286 RIDER	0.20 Hrs	
10/18/21	NFM	PREPARE AND ORGANIZE DOCUMENTS FOR UPCOMING DEPOSITION FOR STEVEN EICHEL (2.5); PREPARE DEPOSITION BINDER FOR STEVEN EICHEL (.8)	3.30 Hrs	
10/19/21	CY	REVIEW LICHTENSTEIN DEPOSITION TRANSCRIPTS(1.0); REVIEW MOSKOVITS DEPOSITION TRANSCRIPTS (1.1); REVISE SCHEDULES AND SOFA (1.5).	3.60 Hrs	
10/19/21	NFM	RETRIEVE DOCUMENTS FROM FILES AND SEND TO STEVE EICHEL (.3); PREPARE AND COORDINATE DEPOSITION TRANSCRIPT HEARING BINDER TO BE SENT TO STEVEN EICHEL (1.0)	1.30 Hrs	
10/20/21	CY	TELEPHONE CONFERENCE WITH SE AND FBR RE SCHEDULES (.6); REVISE SCHEDULES AND SOFA (2.1); CORRESPOND WITH NFM RE SAME (.2).	2.90 Hrs	
10/20/21	CY	TELEPHONE CONFERENCE WITH FBR RE STATUS OF MOTIONS.	0.10 Hrs	
10/20/21	FBR	REVIEW OF BUDGET(0.2); EMAIL TO LEE RE SAME (.2)	0.40 Hrs	
10/20/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs	
10/20/21	LS	TELEPHONE CONFERENCE WITH CY RE CASE HISTORY/BACKGROUND	No Hrs Charge	

Re: CHAPTER 11

10/20/21	NFM	RETRIEVE MOTION TO APPOINT TRUSTEE OF PACER AND DISTRIBUTE SAME (.2); UPDATE LIST OF ADDITIONAL ADDRESSES FOR SERVICE LIST (.8)	1.00 Hrs
10/20/21	SE	REVIEW EMAIL FROM C. YEE RE DRAFT OF SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS (.1); CALL C. YEE RE DRAFT OF SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS (.3); REVIEW DRAFT OF STATEMENT OF FINANCIAL AFFAIRS (.3)	0.70 Hrs
10/21/21	CY	CORRESPOND WITH SE, FBR, LB RE SCHEDULES AND DISCLAIMER (.5); REVISE SAME (.6).	1.10 Hrs
10/21/21	FBR	TELEPHONE CONFERENCE WITH CY RE: DISCLAIMER (0.2) REVIEW AND REVISE SCHEDULES AND SOFA (0.3)	0.50 Hrs
10/21/21	FBR	REVIEW OF [REDACTED]	0.20 Hrs
10/21/21	LS	REVIEW DOCKET FOR CASE HISTORY	No Hrs Charge
10/21/21	NFM	REVIEW DOCUMENT PRODUCTION AND INTERNET FOR ADDITIONAL ADDRESSES FOR SERVICE LIST	No Hrs Charge
10/21/21	SE	REVIEW REVISED SCHEDULES (.2); CALL WITH C. YEE RE FINALIZING REVISED SCHEDULES (.3)	0.50 Hrs
10/22/21	CY	CORRESPOND WITH NFM RE SCHEDULES.	0.20 Hrs
10/22/21	FBR	RECEIVED AND REVIEW OF EMAIL FROM NAGI REGARDING PAYOFF LETTER	0.30 Hrs
10/22/21	FBR	PREPARATION OF RESPONSE TO NAGI LETTER AND SEND TO CLIENT FOR COMMENT AND APPROVAL	0.90 Hrs
10/22/21	NFM	REVIEW AND REVISE SERVICE LIST (.7); REVIEW DOCUMENT PRODUCTION FOR FIRST INSURANCE INSURANCE POLICY FOR STEVEN EICHEL (.8); RETREIVE CONTEMPT ORDER FROM FILES AND SEND SAME TO STEVEN EICHEL (.2)	1.70 Hrs
10/23/21	SE	REVIEW JASON NAGI'S EMAIL TO FRED RINGEL RE PAYOFF LETTER (.1); REVIEW AND REVISE DRAFT OF FRED RINGEL'S RESPONSE (.2)	0.30 Hrs
10/24/21	CY	CORRESPOND WITH SE AND FBR RE SCHEDULES.	0.10 Hrs
10/25/21	CY	REVISE SCHEDULES.	0.40 Hrs
10/25/21	FBR	REVIEW OF FINAL VERSION OF SCHEDULES AND SOFA	0.30 Hrs
10/25/21	NFM	[REDACTED] (.5); REVIEW, PREPARE AND ELECTRONICALLY FILE SCHEDULES AND SOFA (1.0); PREPARE AND UPLOAD MATRIX OF CREDITORS (.5); REVIEW AND REVISE SERVICE LIST (.8)	2.80 Hrs
10/26/21	CY	FINALIZE ARRANGEMENTS TO FILE AND SERVE MOTIONS (.8); CORRESPOND WITH NFM RE SAME (.2); TELEPHONE CONFERENCE WITH FBR RE SAME (.2).	1.20 Hrs
10/26/21	CY	TELEPHONE CONFERENCE WITH CHAMBERS RE HEARING DATES.	0.10 Hrs
10/26/21	FBR	TELEPHONE CONFERENCE WITH CLIENT RE WEEKLY UPDATE MEETING	1.00 Hrs

Re: CHAPTER 11

10/26/21	NFM	REVIEW AND REVISE SERVICE LIST (.5); RETRIEVE LETTERS OFF PACER FOR STEVEN EICHEL (.3)	0.80 Hrs
10/27/21	CY	CORRESPOND WITH LB RE MOTIONS FILED	0.10 Hrs
10/27/21	CY	CORRESPOND WITH TK RE RESPONSE DEADLINES.	0.20 Hrs
10/27/21	CY	CORRESPOND WITH NFM RE SERVICE OF MOTIONS.	0.10 Hrs
10/27/21	NFM	REVIEW AND REDACT E-MAIL ADDRESS IN MOSKOWITZ TRANSCRIPT FOR STEVEN EICHEL (.5); PREPARE AND ELECTRONICALLY FILE COS FOR DOCUMENTS SERVED ON 10/26/21 (1.0)	1.50 Hrs
10/28/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs
10/28/21	LS	REVIEW [REDACTED]	0.20 Hrs
10/28/21	NFM	ELECTRONICALLY FILE BUCHWALD DECLARATION RE TURNOVER ORDER (.3); RETRIEVE SIGNED TURNOVER ORDER OFF PACER AND DISTRIBUTE SAME (.2)	0.50 Hrs
10/29/21	NFM	RETRIEVE DEPOSITION EXHIBIT AND KINGS COUNTY COMPLAINT FROM FILES AND SEND SAME TO STEVEN EICHEL	0.50 Hrs
11/01/21	CY	REVISE SCHEDULES AND EQUITY HOLDERS (.6); CORRESPOND WITH FBR AND JM RE SAME (.5).	1.10 Hrs
11/01/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	1.00 Hrs
11/01/21	FBR	REVIEW AND REVISE SOFA AMENDMENT	0.40 Hrs
11/01/21	LS	REVIEW EMAILS RE EXERCISE OF PLEDGE	0.20 Hrs
11/01/21	LS	REVIEW SCHEDULES	0.20 Hrs
11/02/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	1.10 Hrs
11/02/21	LS	REVIEW SECOND MTD	0.60 Hrs
11/03/21	NFM	UPDATE CALENDAR (.3); REVIEW DEPOSITION TRANSCRIPT QUOTES IN RESPONSE FOR STEVEN EICHEL (1.0)	1.30 Hrs
11/04/21	CY	REVIEW AND PREPARE MOR	0.30 Hrs
11/04/21	NFM	PREPARE AND ELECTRONICALLY FILE MONTHLY OPERATING REPORT (.5); SEND OUT COPIES OF SAME TO UST AND JUDGE (.3)	0.80 Hrs
11/05/21	CY	AMEND STATEMENT OF FINANCIAL AFFAIRS (5); CORRESPOND WITH LB AND FBR RE SAME (.3).	0.80 Hrs
11/05/21	LS	TELEPHONE CONFERENCE WITH CY 4X RE [REDACTED]	0.20 Hrs
11/05/21	NFM	PREPARE AND ELECTRONICALLY FILE AMENDED SCHEDULES (.4); SEND OUT COURTESY COPY OF SAME (.1)	0.50 Hrs
11/08/21	CY	CORRESPOND WITH NFM RE TOA/TOC.	No Hrs Charge
11/08/21	LS	REVIEW NOA COJ CREDITOR	No Hrs Charge

Re: CHAPTER 11

Date	Initials	Description	Hours	Charge
11/08/21	LS	REVIEW ECF DOCKET FOR CALENDAR UPDATE ON PENDING MOTIONS	No	Hrs
11/09/21	CY	CORRESPOND WITH NFM AND ADDRESS SERVICE ISSUES.	No	Hrs
11/09/21	LS	REVIEW ECF BOUNCES RE NOTICE PARTIES	No	Hrs
11/09/21	LS	REVIEW LOCAL RULES/GUIDELINES RE ECF AND ELECTRONIC NOTICE REQUIREMENTS	0.20	Hrs
11/09/21	LS	REVIEW FRBP RE SERVICE, TIME FOR SERVICE	0.20	Hrs
11/09/21	NFM	PREPARE AND ELECTRONICALLY FILE DEBTOR'S RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY AND DECLARATION (1.0); SERVE SAME (.3); RETRIEVE VARIOUS DEVELOPMENT MOTIONS AND OBJECTION AS WELL AS JUDGMENT CREDITOR'S JOINDERS OFF PACER AND DISTRIBUTE SAME (.7)	2.00	Hrs
11/10/21	LS	REVIEW LICHTENSTEIN EMAIL TO BUCHWALD	0.20	Hrs
11/10/21	LS	REVIEW OUTLINE OF PLEDGE AGREEMENT ANALYSIS	0.20	Hrs
11/10/21	NFM	DRAFT COS FOR 3 DEBTOR'S RESPONSE/OBJECTIONS (.5); ELECTRONICALLY FILE SAME (.3); DRAFT 11/16/21 AGENDA (1.7)	2.50	Hrs
11/11/21	NFM	DRAFT, REVIEW AND REVISE 11/16/21 HEARING AGENDA	3.80	Hrs
11/12/21	LS	TELEPHONE CONFERENCE WITH NFM RE CALENDAR, REGISTRATION FOR APPEARANCE AND AGENDA	0.20	Hrs
11/12/21	NFM	OBTAIN COURT APPEARANCES FOR FRED RINGEL AND CLEMENT YEE FOR UPCOMING 10/16/21 HEARING (.3); PREPARE AND ELECTRONICALLY FILE OMNIBUS REPLY (1.3); SERVE SAME (.5); PREPARE AND ELECTRONICALLY FILE CORBIN DECLARATION (.8); SERVE SAME (.2); SEND OUT COURTESY COPIES OF OMNIBUS REPLY AND CORBIN DECLARATION (.2)	3.30	Hrs
11/13/21	CY	CORRESPOND WITH FBR AND MC RE FILING DEADLINES.	0.20	Hrs
11/15/21	LS	REVIEW AGENDA	0.20	Hrs
11/15/21	NFM	ELECTRONICALLY FILE COS FOR OMNIBUS REPLY AND CORBIN DECLARATION (.3); RETRIEVE DEVELOPMENT REPLY RE MOTION TO DISMISS OFF PACER AND DISTRIBUTE SAME (.2); OFFICE CONFERENCE WITH LORI SCHWARTZ RE STATUS OF AGENDA (.2); REVIEW AND REVISE SAME (.3); PREPARE AND ELECTRONICALLY FILE AGENDA FOR 11/16/21 HEARING (.5); SERVE SAME (.2); SEND SAME TO JUDGE (.2); UPDATE SERVICE LIST (.2); RETRIEVE DEVELOPMENT SUPPLEMENTAL DOCUMENT PRODUCTION FROM INTERNET AND SAVE TO SYSTEM AND Y DRIVE (.3)	2.40	Hrs
11/16/21	CY	DRAFT ORDERS FOR OMNIBUS HEARING.	2.50	Hrs
11/16/21	LS	TELEPHONE CONFERENCE WITH CY RE HEARING UPDATE	0.10	Hrs
11/16/21	LS	EMAIL TO CY RE HEARING UPDATE	0.10	Hrs
11/16/21	NFM	ORDER HEARING TRANSCRIPT FROM ESCRIBERS FOR 11/16/21 HEARING TRANSCRIPT (.3); TELEPHONE CALLS TO FRED RINGEL AND OTHER TRANSCRIPTION COMPANIES RE OBTAINING 11/16/21 HEARING TRANSCRIPT (1.0)	No	Hrs

Re: CHAPTER 11

11/17/21	CY	REVISE OMNIBUS ORDERS FROM 11/16 HEARING.	1.00 Hrs
11/17/21	NFM	TELEPHONE CALLS AND E-MAILS WITH VARIOUS TRANSCRIPT COMPANIES RE NEEDS AND COORDINATION FOR 11/19/21 HEARING TRANSCRIPT (1.8); E-MAILS AND TELEPHONE CALLS WITH FRED RINGEL RE SAME (.3)	No Hrs Charge
11/18/21	CY	REVISE AND SUBMIT ORDERS FROM 11/16 HEARING.	0.50 Hrs
11/18/21	CY	REVIEW ENTERED INTERIM COMPENSATION ORDER.	0.10 Hrs
11/18/21	NFM	RETRIEVE NOTICE OF COMMENCEMENT OFF PACER AND SAVE TO SYSTEM (.2); UPDATE CALENDAR (.1); RETRIEVE RECENTLY SIGNED ORDERS OFF PACER AND SAVE TO SYSTEM (.2)	0.50 Hrs
11/19/21	NFM	UPDATE CALENDAR (.3); PREPARE AND DISTRIBUTE 11/16/21 HEARING TRANSCRIPT (.2)	0.50 Hrs
11/23/21	NFM	RETRIEVE DEVELOPMENT MOTION TO PAY OFF LENDER OFF PACER AND DISTRIBUTE SAME (.3); RETRIEVE NOTICE OF HEARING RE SAME OFF PACER AND DISTRIBUTE SAME (.2); UPDATE CALENDAR (.2); PREPARE AND ELECTRONICALLY FILE MOTION FOR BID PROCEDURES (.5); PREPARE AND ELECTRONICALLY FILE MOTION TO SHORTEN TIME (.3)	1.50 Hrs
11/24/21	CY	CORRESPOND WITH FBR AND CHAMBERS RE MOTION TO SHORTEN TIME.	0.20 Hrs
11/24/21	NFM	RETRIEVE AND SEND HEARING TRANSCRIPTS FROM FILES FOR STEVEN EICHEL (.3); RETRIEVE CASES OF LEXIS FOR SAME (.2); RETRIEVE ENVIRONMENTAL PHASE I AND II DOCS OFF WEB SITE AND SAVE TO Y DRIVE AND WORLDDOCS PER FRED RINGEL'S REQUEST (.8); ORDER TRANSCRIPT FOR 11/23/21 HEARING (.2); REVIEW DEVELOPMENT MOTIONS ON SYSTEM FOR REDEMPTION LANGUAGE FOR STEVEN EICHEL (1.0); PREPARE AND SERVE BID PROCEDURES MOTION AND ORDER SHORTENING TIME (.7)	3.20 Hrs
11/29/21	LS	REVIEW DOCKET RE PENDING MOTIONS	No Hrs Charge
11/29/21	NFM	DRAFT, PREPARE AND ELECTRONICALLY FILE COS FOR BID PROCEDURES MOTION AND ORDER TO SHORTEN (1.3); REVIEW BANKRUPTCY DOCKET AND PLEADINGS TO ANSWER QUESTIONS FOR STEVEN EICHEL AND E-MAIL ANSWERS TO SAME (1.0)	2.30 Hrs
12/01/21	NFM	RETRIEVE HEARING TRANSCRIPT FROM TRANSCRIBER AND DISTRIBUTE SAME	0.30 Hrs
12/02/21	FBR	REVIEW OF [REDACTED]	0.40 Hrs
12/03/21	CY	REVIEW OPERATING REPORT.	0.20 Hrs
12/03/21	NFM	DRAFT COS FOR RESPONSE TO DEVELOPMENT MOTION TO PAYOFF LENDER (.3); ELECTRONICALLY FILE SAME (.2); RETRIEVE DEVELOPMENT OBJECTION TO BID PROCEDURES OFF PACER AND DISTRIBUTE SAME (.3);	0.80 Hrs
12/06/21	LS	REVIEW CORBIN DRAFT DECLARATION	0.20 Hrs
12/06/21	NFM	RETRIEVE DEVELOPMENT OMNIBUS REPLY OFF PACER AND DISTRIBUTE SAME	0.20 Hrs

Re: CHAPTER 11

12/07/21	FBR	TELEPHONE CONFERENCE WITH STATUS MEETING WITH CLIENT RE CASE	1.00 Hrs
12/07/21	NFM	SET UP APPEARANCE FOR FRED RINGEL FOR UPCOMING HEARING (.2); PREPARE AND ELECTRONICALLY FILE REPLY, CORBIN DECLARATION AND RINGEL DECLARATION AND RELATED EXHIBITS (1.3); SERVE SAME AND SEND TO CLIENT (.5)	2.00 Hrs
12/08/21	NFM	DRAFT COS FOR REPLY RE BID PROCEDURES (.3); ELECTRONICALLY FILE SAME (.2); SAVE RECENTLY FILED SUPPLEMENTAL DECLARATION TO SYSTEM AND DISTRIBUTE SAME (.2)	0.70 Hrs
12/09/21	CY	TELEPHONE CONFERENCE WITH FBR AND LS RE CASE ISSUES.	0.40 Hrs
12/09/21	NFM	ORDER 12/9/21 HEARING TRANSCRIPT	No Hrs Charge
12/10/21	CY	TELEPHONE CONFERENCE WITH LEE RE OPERATING REPORT.	0.30 Hrs
12/13/21	AMG	REVIEW OF TOBI LETTER TO FRED AND ROGER	No Hrs Charge
12/13/21	AMG	REVIEW OF SOAF; TELEPHONE CONFERENCE WITH ROGER AND FRED	No Hrs Charge
12/13/21	NFM	RETRIEVE BID PROCEDURES ORDER OFF PACER AND DISTRIBUTE SAME (.3); UPDATE CALENDAR RE DATES FOR SAME (.5); PREPARE AND SEND PDF OF PETITION AND SCHEDULES TO CLEMENT YEE (.2)	1.00 Hrs
12/13/21	RMS	RECEIVED AND REVIEW OF EMAIL FROM TOM & FRED & OTHER ON COMMUNICATIONS & EMAILS TO AND FROM LS & CY RE SAME	No Hrs Charge
12/14/21	CY	REVIEW 12/9 HR'G TR.	No Hrs Charge
12/14/21	FBR	TELEPHONE CONFERENCE WITH LEE RE PREP FOR 341	1.10 Hrs
12/14/21	NFM	UPDATE, REVIEW AND REVISE SERVICE LIST (1.0); RETRIEVE RECENTLY FILED POCS FROM PACER AND SAVE TO SYSTEM (.3); REVIEW AND DISTRIBUTE 12/9/21 HEARING TRANSCRIPT (.2); UPDATE CALENDAR (.3)	1.80 Hrs
12/17/21	LS	TELEPHONE CONFERENCE WITH CY RE FILING AND EMAILING LETTER TO ABRAMS CHAMBERS	0.10 Hrs
12/17/21	LS	UPDATE CALENDAR	0.20 Hrs
12/17/21	LS	PREPARE APPEAL FILE	No Hrs Charge
12/20/21	CY	REVIEW OPERATING REPORT (.3); CORRESPOND WITH LEE RE SAME (.1).	0.40 Hrs
12/20/21	FBR	PREPARATION OF EMAIL TO LEE REGARDING AMENDMENT TO AUGUST AND NOVEMENT MOR	0.20 Hrs
12/21/21	CY	TELEPHONE CONFERENCE WITH FBR RE INTERIM COMPENSATION (.1); DRAFT SAME (2.9); TELEPHONE CONFERENCE WITH CHAMBERS RE SAME (.1).	3.10 Hrs
12/21/21	CY	CORRESPOND WITH NFM RE OPERATING REPORT.	0.10 Hrs

Re: CHAPTER 11

12/21/21	FBR	REVIEW AND REVISE MONTHLY COMPENSATION ORDER AND APPLICATION	1.30 Hrs
12/21/21	NFM	UPDATE CALENDAR	0.30 Hrs
12/22/21	CY	CORRESPOND WITH NFM RE OPERATING REPORT.	0.10 Hrs
12/22/21	CY	TROUBLESHOOT ISSUES WITH OPERATING REPORT.	No Hrs Charge
12/22/21	LS	REVIEW SOFA AND AMENDED SOFA	0.20 Hrs
12/22/21	NFM	PREPARE AND ELECTRONICALLY FILE AUGUST AMENDED OPERATING REPORT AND NOVEMBER OPERATING REPORT	1.70 Hrs
12/29/21	NFM	PREPARE AND ELECTRONICALLY FILE JOINDER (.8); SERVE SAME (.2); UPDATE SERVICE LIST (.3)	1.30 Hrs
12/30/21	LS	REVIEW EMAIL FROM CHAMBERS RE: SCHEDULING	0.10 Hrs
12/30/21	LS	REVIEW MOSKOVITS EMAIL	0.20 Hrs
12/30/21	LS	TELEPHONE CONFERENCE WITH RMS RE MOSKOVITS EMAIL	0.10 Hrs
12/30/21	LS	REVIEW OPERATING AGREEMENT	0.20 Hrs
12/30/21	LS	REVIEW TRANSCRIPT OF MTR	0.70 Hrs
12/30/21	NFM	PREPARE MOTION TO TERMINATE EXCLUSIVITY DOCS FOR STEVEN EICHEL (1.2); PREPARE AND ELECTRONICALLY FILE COS FOR JOINDER (.3); PREPARE AND ELECTRONICALLY FILE SUPPLEMENT TO JOINDER (.5); SERVE SAME (.2)	2.20 Hrs
12/30/21	RMS	RECEIVED AND REVIEW OF EMAIL FROM TOBY M. RE CASE & TELEPHONE CONFERENCE WITH CY RE EMAIL & SE RE SAME & LS ON EMAIL	No Hrs Charge
01/03/22	NFM	PREPARE AND ELECTRONICALLY FILE COS FOR SUPPLEMENTAL JOINDER TO BE AVIV MOTION FOR CONTEMPT (.5); UPDATE CALENDAR (.3)	0.80 Hrs
01/04/22	LS	REVIEW 11-16 TRANSCRIPT	0.30 Hrs
01/05/22	AMG	TELEPHONE CONFERENCE WITH FRED RE COURT HEARING	0.20 Hrs
01/05/22	CY	REVISE INTERIM COMPENSATION ORDER (.1); SUBMIT SAME (.1).	0.20 Hrs
01/05/22	CY	CORRESPOND WITH LB RE MOR.	0.10 Hrs
01/05/22	NFM	PREPARE AND ELECTRONICALLY FILE COS FOR OBJECTION TO PAYOFF MOTION (.5); PREPARE AND SEND DOCUMENTS FOR UPCOMING HEARING TO FRED RINGEL AND CLEMENT YEE (.5); REVIEW AND SEND SERVICE LIST TO CLEMENT YEE (.5); DISTRIBUTE SCHEDULING ORDER (.2)	1.70 Hrs
01/06/22	NFM	RETRIEVE RECENTLY ENTERED ORDERS OFF PACER, SAVE TO SYSTEM AND DISTRIBUTE (.5); UPDATE CALENDAR (.3)	0.80 Hrs
01/11/22	CY	TELEPHONE CONFERENCE WITH SE RE STATUS.	0.10 Hrs
01/11/22	CY	REVIEW OPERATING REPORT AND CORRESPOND WITH LEE RE SAME.	0.20 Hrs
01/11/22	NFM	REVIEW, PREPARE AND ORGANIZE DOCUMENTS FOR HEARING AND SEND SAME TO FRED RINGEL AND CLEMENT YEE (1.0); SIGN UP CLEMENT YEE FOR UPCOMING HEARING (.2);	1.20 Hrs

Re: CHAPTER 11

01/12/22	CY	REVIEW OPERATING REPORT.	0.10 Hrs
01/19/22	CY	CORRESPOND WITH FBR RE MOR.	0.10 Hrs
01/19/22	CY	CORRESPOND WITH NFM AND LEE RE FORM OF REPORT.	No Hrs Charge
01/19/22	NFM	REVIEW AND PREPARE MONTHLY OPERATING REPORT (1.0); ELECTRONICALLY FILE AND SEND OUT SAME (.3)	1.30 Hrs
01/20/22	CY	SUBMIT LETTER TO CHAMBERS RE CONFERENCE.	0.10 Hrs
01/20/22	NFM	RETRIEVE LETTER FROM NAGI TO JUDGE BECKERRMAN OFF PACER AND DISTRIBUTE SAME (.3); PREPARE AND ELECTRONICALLY FILE RESPONSE LETTER RE SAME (.5)	0.80 Hrs
01/21/22	FBR	CONFERENCE WITH CLIENT RE STATUS CONFERENCE AND NEXT STEPS	0.40 Hrs
01/21/22	NFM	SAVE RECENTLY FILED DOCUMENTS TO SYSTEM	No Hrs Charge
01/25/22	FBR	TELEPHONE CONFERENCE WITH BUCHWALD RE STATUS AND CALL WITH NAGI AND UST RE DISMISSAL AND STRUCTURE	1.00 Hrs
01/26/22	AMG	TELEPHONE CONFERENCE WITH FRED RE STATUS AND ALL MATTERS	0.30 Hrs
01/27/22	NFM	SAVE RECENTLY FILED PLEADINGS TO WORLDOX	No Hrs Charge
01/28/22	CY	ADJOURN CONFIRMATION HEARING.	0.30 Hrs
01/28/22	FBR	PREPARATION OF EMAIL PATRICK CHEN RE ADJOURNMENT OF CONFIRMATION HEARING TO 2/23 AND NEED TO OBTAIN LENDER'S CONSENT	0.10 Hrs
01/28/22	FBR	RECEIVED AND REVIEW OF EMAIL SPELFOGEL REGARDING SETTING UP CALL	0.10 Hrs
01/28/22	FBR	PREPARATION OF EMAIL TO SPELFOGEL FORWARDING COPY OF PRIOR RESPONSE	0.10 Hrs
01/28/22	LS	REVIEW CALENDAR	0.20 Hrs
01/28/22	LS	REVIEW SCHEDULING ORDER RE PAYOFF AND ESCROW FUNDING DEADLINES	0.20 Hrs
01/28/22	NFM	COORDINATE APPEARANCE OF FRED RINGEL FOR UPCOMING STATUS CONFERENCE	0.20 Hrs
01/31/22	NFM	SAVE RECENTLY FILED PLEADINGS TO WORLDOX	No Hrs Charge
02/01/22	FBR	PREPARATION OF EMAIL SPELFOGEL RE REQUEST FOR ITEMIZED FEE STATEMENT	0.20 Hrs
02/02/22	FBR	RECEIVED AND REVIEW OF EMAIL JOYCE KUHNS RE LEE BUCHWALD INVOICE	0.10 Hrs
02/02/22	FBR	PREPARATION OF EMAIL TO LEE [REDACTED] [REDACTED]	0.50 Hrs

Re: CHAPTER 11

02/03/22	CY	DRAFT FEE STATEMENT (.3); CORRESPOND WITH NFM RE SERVICE (.1).	0.40 Hrs
02/04/22	LS	TELEPHONE CONFERENCE WITH NFM 3X RE FILING RESPONSE TO PAYOFF SUPPLEMENT	0.20 Hrs
02/04/22	NFM	PREPARE AND ELECTRONICALLY FILE RESPONSE TO SUPPLEMENT TO PAYOFF MOTION (1.0); SERVE SAME (.3); SEND OUT COURTESY COPY OF SAME (.2); PREPARE AND ELECTRONICALLY FILE COS FOR SAME (.5); PREPARE BINDER OF DOCUMENTS FOR UPCOMING HEARING FOR STEVE EICHEL (.5)	2.50 Hrs
02/09/22	LS	EMAIL FBR ATTACHING R.E. TAX STATEMENT	0.10 Hrs
02/11/22	NFM	RETRIEVE ORDER RE DISPUTED PAYOFF AMOUNT OFF PACER AND DISTRIBUTE AND SAVE SAME	0.20 Hrs
02/14/22	CY	CORRESPOND WITH LEE RE MOR.	0.10 Hrs
02/14/22	LS	TELEPHONE CONFERENCE WITH FBR RE NEW MTD AND CALENDAR UPDATES	0.20 Hrs
02/14/22	NFM	PREPARE AND ELECTRONICALLY FILE LETTER TO JUDGE BECKERMAN RE ORDER RETURNING DEPOSIT	0.50 Hrs
02/15/22	CY	REVIEW OPERATING REPORT.	0.10 Hrs
02/15/22	NFM	PREPARE MONTHLY OPERATING REPORT	0.30 Hrs
02/16/22	NFM	PREPARE AND ELECTRONICALLY FILE MONTHLY OPERATING REPORT (.8); SEND OUT SAME (.2)	1.00 Hrs
02/17/22	NFM	RETRIEVE DEPOSIT ORDER OFF PACER AND SAVE SAME TO SYSTEM	0.20 Hrs
02/18/22	CY	DRAFT AND SUBMIT AMENDMENT TO PAYOFF ORDER (.5); TELEPHONE CONFERENCE WITH NFM, FBR, AND CHAMBERS RE SAME (.3).	No Hrs Charge
02/18/22	NFM	UPDATE CALENDAR (.5); PREPARE AND SERVE BY OVERNIGHT DELIVERY PAYBACK ORDER (2.2); ELECTRONICALLY FILE COS FOR SAME (.3)	3.00 Hrs
02/20/22	CY	TELEPHONE CONFERENCE WITH LS RE STATUS OF MATTERS.	0.10 Hrs
02/22/22	NFM	SAVE RECENTLY FILED PLEADINGS TO SYSTEM AND DISTRIBUTE SAME	0.30 Hrs
02/23/22	NFM	RETRIEVE PLEADINGS AND DOCUMENTS FROM FILES AND OFF PACER AND SEND SAME TO STEVEN EICHEL	1.00 Hrs
02/24/22	NFM	DRAFT, REVIEW AND REVISE NOTICE FOR RECONSIDERATION MOTION (.5); RETRIEVE DOCUMENT FROM FILES AND PACER FOR STEVEN EICHEL (1.0); RETRIEVE CASES OFF LEXIS FOR STEVE EICHEL (.8); RESEARCH "MANIFEST INJUSTICE" ON LEXIS FOR STEVE EICHEL (1.0)	3.30 Hrs
02/25/22	LS	CALENDAR UPDATES	0.10 Hrs
02/25/22	NFM	PREPARE AND ELECTRONICALLY FILE MOTION TO RECONSIDER 2/11/22 ORDER (.5); PREPARE AND SERVE SAME (1.0); UPDATE CALENDAR (.2)	1.70 Hrs

Re: CHAPTER 11

02/28/22	NFM	ELECTRONICALLY FILE COS OF TF FOR MOTION TO RECONSIDER 2/11/22 ORDER	0.30 Hrs	
03/01/22	CY	CORRESPOND WITH RUBIN RE HEARING TRANSCRIPT.	No Hrs Charge	
03/03/22	CY	TELEPHONE CONFERENCES WITH LS AND FBR RE RIDER ISSUES.	0.50 Hrs	
03/03/22	FBR	REVIEW OF ORDER ENTERED BY COURT RE LINKEDLN POST	0.10 Hrs	
03/03/22	LS	UPDATE CALENDAR	0.20 Hrs	
03/03/22	NFM	REVIEW SCHEDULING ORDER AND UPDATE CALENDAR	1.00 Hrs	
03/04/22	NFM	UPDATE SERVICE LIST	0.10 Hrs	
03/04/22	NFM	PREPARE AND SEND APPEAL DOCS TO STEVEN EICHEL	No Hrs Charge	
03/07/22	NFM	RETRIEVE VARIOUS TRANSCRIPTS AND PLEADINGS AND SEND SAME TO STEVEN EICHEL	1.00 Hrs	
03/08/22	NFM	PREPARE AND SEND APPEAL DOCS TO STEVE EICHEL	0.30 Hrs	
03/09/22	CY	TELEPHONE CONFERENCE WITH FBR AND LS RE OUTSTANDING DEADLINES.	0.20 Hrs	
03/10/22	CY	REVIEW OPERATING REPORT.	0.10 Hrs	
03/10/22	CY	TELEPHONE CONFERENCE WITH LS RE CASE ISSUES.	0.10 Hrs	
03/10/22	NFM	PREPARE AND ELECTRONICALLY FILE MONTHLY OPERATING REPORT	0.50 Hrs	
03/11/22	LS	TELEPHONE CONFERENCE WITH CY RE BUCHWALD ADMIN CLAIM MOTION AND FEE APP	0.10 Hrs	
03/11/22	NFM	PREPARE AND ELECTRONICALLY FILE REPLY TO OMNIBUS OBJECTION	0.50 Hrs	
CASE ADMINISTRATION Totals			133.80 Hrs	\$45,498.50

CLAIMS ADMINISTRATION AND OBJECTIONS

10/20/21	SE	REVIEW EMAIL FROM C. YEE RE ADDRESSES FOR CERTAIN PARTIES FOR BAR DATE NOTICE (.1); DRAFT RESPONSE (.1)	0.20 Hrs
10/25/21	CY	CORRESPOND WITH [REDACTED] (.3); REVISE BAR DATE DOCUMENTS (.2).	0.50 Hrs
10/25/21	FBR	REVIEW AND REVISE BAR DATE NOTICE ORDER AND APPLICATION	0.60 Hrs
10/26/21	CY	TELEPHONE CONFERENCE WITH CHAMBERS RE BAR DATE (.2); AMEND BAR DATE APPLICATION AND NOTICE (.7).	0.90 Hrs
10/26/21	NFM	ELECTRONICALLY FILE AND SERVE AMENDED BAR DATE MOTION (0.8); SEND OUT COURTESY COPY OF SAME (.1)	0.90 Hrs
10/27/21	LS	REVIEW DOCKET AND CLAIMS REGISTER	0.30 Hrs
11/01/21	LS	REVIEW DOCKET/CLAIMS REGISTER FOR UPDATES RE FILINGS & CLAIMS	0.30 Hrs
11/08/21	LS	REVIEW CLAIMS REGISTER	0.10 Hrs

Re: CHAPTER 11

11/09/21	CY	SUBMIT BAR DATE APPLICATION (.2); CORRESPOND WITH NFM RE SERVICE (.2).	0.40 Hrs
11/09/21	NFM	PREPARE AND SERVE NOTICE OF BAR DATE, BAR DATE ORDER AND POC FORM	1.00 Hrs
11/10/21	NFM	DRAFT COS FOR BAR DATE MATERIALS (.5); ELECTRONICALLY FILE SAME (.3)	0.80 Hrs
12/08/21	LS	REVIEW NYC CLAIM AND RECONCILE WITH R.E. TAX ACCOUNT STATEMENT	0.40 Hrs
12/08/21	LS	EMAIL TO FBR RE CLAIM BREAKDOWN	0.10 Hrs
12/08/21	LS	PREPARE CLAIM RECONCILIATION/BREAKDOWN	0.60 Hrs
12/08/21	NFM	REVIEW RETURNED MAIL RE PROOF OF CLAIM AND BAR DATE (.2); REVIEW INTERNET FOR NEW ADDRESSES (.3); E-MAILS AND DISCUSSIONS RE SAME WITH CLEMENT YEE AND FRED RINGEL (.2); PREPARE AND RESEND OUT SAME (.3)	1.00 Hrs
01/27/22	LS	REVIEW CLAIMS	0.20 Hrs
01/28/22	LS	REVIEW TITAN LATE-FILED CLAIMS AND OFFIT KURMAN REFERENCE	0.20 Hrs
01/28/22	LS	PREPARE BREAKDOWN OF ADMIN FEE PAYMENTS	0.30 Hrs
01/30/22	LS	PREPARE SCHEDULE OF UNPAID ADMIN AND GENERAL UNSECURED CLAIMS SCHEDULE [REDACTED]	0.20 Hrs
01/30/22	LS	RECONCILE CLAIMS, CREDITOR STIPS AND BALLOTS IN CONNECTION WITH OPP TO PAYOFF SUPPLEMENT	0.60 Hrs
02/03/22	LS	REVIEW TITAN CLAIM 7 AND AGREEMENT AND COMPARE WITH CLAIM 4 AND 6, CREDITOR STIPULATION AND BALLOT	0.70 Hrs
02/03/22	LS	EMAIL FBR & CY RE ANALYSIS OF TITAN CLAIM AND ENFORCEMENT OF AGREEMENT	0.20 Hrs
02/18/22	CY	CORRESPOND WITH LEE AND FBR RE ADMIN CLAIM (.2); PREPARE SAME (.3).	0.50 Hrs
02/25/22	CY	DRAFT ADMIN CLAIM.	0.60 Hrs
02/28/22	CY	DRAFT ADMIN CLAIM MOTION.	0.80 Hrs
03/01/22	CY	REVISE ADMIN CLAIM.	0.20 Hrs
03/01/22	LS	TELEPHONE CONFERENCE WITH FBR RE ADMIN CLAIM MOTION AND FEE APP STATUS	0.20 Hrs
03/02/22	CY	CORRESPOND WITH LS RE ADMIN CLAIM (.2); DRAFT ADMIN CLAIM (2.3).	2.50 Hrs
03/09/22	LS	TELEPHONE CONFERENCE WITH CY RE FEE APP AND ADMIN CLAIM MOTION DEADLINES AND STATUS	0.10 Hrs
03/10/22	CY	DRAFT ADMINISTRATIVE CLAIM.	0.60 Hrs
03/10/22	LS	REVIEW BUCHWALD ADMIN PAYMENT MOTION	0.20 Hrs
03/10/22	LS	TELEPHONE CONFERENCE WITH CY RE ADMIN PAYMENT MOTION	0.10 Hrs

CLAIMS ADMINISTRATION AND OBJECTIONS Totals 16.30 Hrs \$7,748.00

Re: CHAPTER 11

RETENTION APPLICATION PREPARATION & PROCESSING

10/20/21	CY	REVISE ROSEWOOD RETENTION.	0.30 Hrs
10/22/21	CY	CORRESPOND WITH LEE AND GREG RE ROSEWOOD RETENTION.	0.20 Hrs
10/22/21	FBR	PREPARATION OF EMAIL CY TO TRANSMIT ROSEWOOD APP TO LEE FOR REVIEW	0.10 Hrs
10/22/21	FBR	RECEIVED AND REVIEW OF EMAIL LEE REGARDING STATUS OF ROSEWOOD	0.10 Hrs
10/25/21	CY	CORRESPOND WITH NFM RE BROKER RETENTION.	0.20 Hrs
10/25/21	NFM	DRAFT NOTICE OF HEARING ON REAL ESTATE BROKER RETENTION MOTION (.2); REVIEW AND PREPARE RETENTION MOTION AND EXHIBITS FOR E-FILEING (.5)	0.70 Hrs
10/26/21	NFM	ELECTRONICALLY FILE AND SERVE RE BROKER RETENTION MOTION (1.0); SEND OUT COURTESY COPY OF SAME (.1)	1.10 Hrs
10/29/21	LS	REVIEW [REDACTED]	0.20 Hrs
10/29/21	LS	REVIEW DOCKET RE APPEARANCE & SUBSTITUTION OF COUNSEL FOR DEVELOPMENT	0.20 Hrs
11/10/21	FBR	TELEPHONE CONFERENCE WITH C CLEMENT YEE RE OBJECTION TO BROKER RETENTION	0.70 Hrs
11/10/21	FBR	TELEPHONE CONFERENCE WITH GREG CORBIN RE OBJECTIONS TO RETENTION APP AND HOW TO ADDRESS IN RESPONSE	0.70 Hrs
11/11/21	CY	CORRESPOND WITH CHAMBERS RE MOTION TO VACATE.	0.20 Hrs
11/11/21	CY	TELEPHONE CONFERENCES WITH FBR AND CORBIN RE REPLY TO BROKER RETENTION (.3) DRAFT REPLY (3.0).	3.30 Hrs
11/11/21	FBR	PREPARATION OF RESPONSE TO ROSEWOOD OBJECTION	0.50 Hrs
11/11/21	FBR	TELEPHONE CONFERENCE WITH CY RE ROSEWOOD OBJECTION	0.30 Hrs
11/11/21	NFM	REVIEW DOCKETS IN PREVIOUS BANKRUPTCY FROM SDNY AND EDNY FOR ROSEWOOD RETENTION AGREEMENTS AND ORDERS (.8); RETRIEVE SAME OFF PACER AND SAVE TO SYSTEM (.5); SEND SAME TO CLEMENT YEE (.2)	1.50 Hrs
11/12/21	CY	TELEPHONE CONFERENCE WITH CORBIN RE DECLARATION (.3); AND REVISE SAME (.6).	0.90 Hrs
11/16/21	FBR	REVIEW AND REVISE ORDER TO RETAIN BROKER	0.30 Hrs
11/17/21	FBR	REVIEW AND REVISE BROKER ORDER AND SEND TO ROSEWOOD COUNSEL FOR REVIEW	0.20 Hrs
11/17/21	FBR	REVIEW OF CHANGES TO ROSEWOOD ORDER FROM ITS COUNSEL AND SEND TO LENDER FOR REVIEW AND APPROVAL	0.20 Hrs
11/18/21	CY	REVIEW ENTERED BROKER ORDER,	0.10 Hrs
11/18/21	CY	REVIEW ENTERED ORDER DENYING MOTION TO VACATE RB RETENTION.	0.10 Hrs

Re: CHAPTER 11

01/26/22	NFM	DRAFT SUPPLEMENTAL DECLARATION IN SUPPORT OF RB RETENTION	0.30 Hrs	
01/28/22	NFM	ELECTRONICALLY FILE SUPPLEMENTAL DECL IN SUPPORT OF RB RETENTION	0.30 Hrs	
		RETENTION APPLICATION PREPARATION & PROCESSING Totals	12.70 Hrs	\$6,045.50

FINANCING

10/17/21	CY	REVISE DIP MOTION.	0.30 Hrs	
10/19/21	CY	REVIEW DIP LOAN AGREEMENT (.4); REVIEW DIP ORDER (.6); REVISE DIP MOTION (.6);	1.60 Hrs	
10/20/21	CY	REVISE DIP DOCUMENTS.	0.30 Hrs	
10/20/21	FBR	TELEPHONE CONFERENCE WITH MOLDOVAN RE NEGOTIATION OF TERMS OF DIP LOAN	0.30 Hrs	
10/21/21	CY	DRAFT DIP DECLARATION (.1); DRAFT DIP MOTION AND ORDER (1.3).	1.40 Hrs	
10/22/21	CY	REVIEW DIP LOAN AGREEMENT (1.1); DRAFT IDP MOTION (3.2); REVISE DIP ORDER (1.0); TELEPHONE CONFERENCE WITH FBR RE DIP (.3); CORRESPOND WITH MC RE SAME (.2).	5.90 Hrs	
10/22/21	FBR	REVIEW AND REVISE DIP ORDER	1.90 Hrs	
10/23/21	CY	DRAFT DIP MOTION.	1.00 Hrs	
10/23/21	FBR	REVIEW OF FINAL DIP LOAN AGREEMENT	0.80 Hrs	
10/23/21	FBR	REVIEW AND REVISE DIP FINAL ORDER	1.10 Hrs	
10/24/21	CY	REVISE DIP MOTION (1.1); TELEPHONE CONFERENCE WITH FBR RE SAME (.1); CORRESPOND WITH JM RE DIP AGREEMENT AND ORDER (.2); DRAFT BUCHWALD DECLARATION (.8).	2.20 Hrs	
10/24/21	FBR	REVIEW AND REVISE DIP AGREEMENT FINAL	1.30 Hrs	
10/24/21	FBR	REVIEW OF DIP FINANCING MOTION	1.00 Hrs	
10/24/21	FBR	REVIEW AND REVISE LEE BUCHWALD DECLARATION SUPPORTING DIP LOAN	0.60 Hrs	
10/24/21	FBR	REVIEW AND REVISE DIP MOTION	0.40 Hrs	
10/25/21	CY	REVISE DIP MOTION.	0.40 Hrs	
10/25/21	FBR	REVIEW OF DIP ORDER (FINAL REVIEW)	0.50 Hrs	
10/25/21	NFM	DRAFT NOTICE OF HEARING ON DIP MOTION	0.20 Hrs	
10/26/21	CY	CORRESPOND WITH FBR, LEE, JM RE BUDGET (.5); AMEND BUDGET (.7) REVIEW SERVICE ISSUES WITH NFM (.3); REVISE DIP MOTION (.7); CORRESPOND WITH FBR RE SAME (.3).	2.50 Hrs	
10/26/21	NFM	REVIEW, PREPARE AND E-FILE DIP FINANCING MOTION AND EXHIBITS (1.0); SERVE SAME (.5); SEND OUT COURTESY COPY OF SAME (.1)	1.60 Hrs	
10/27/21	CY	REVIEW BUDGET AND CORRESPOND WITH NFM RE FILING.	0.20 Hrs	
10/27/21	NFM	ELECTRONICALLY FILE AND SERVICE DIP FINANCING BUDGET	0.70 Hrs	

Re: CHAPTER 11

10/28/21	LS	TELEPHONE CONFERENCE WITH CY RE FINANCING MOTION AND MILESTONES FOR SALE/CONFIRMATION	0.10 Hrs	
10/28/21	NFM	PREPARE AND ELECTRONICALLY FILE COS FOR DIP BUDGET	0.30 Hrs	
11/08/21	CY	CORRESPOND WITH NYC RE DIP ORDER.	0.10 Hrs	
11/09/21	CY	CORRESPOND WITH NYC AND FBR RE DIP ORDER (.2); REVISE SAME (.2).	0.40 Hrs	
11/10/21	CY	REVIEW DIP OBJECTION (.4); CORRESPOND WITH FBR RE SAME (.1).	0.50 Hrs	
11/10/21	CY	DRAFT DIP REPLY.	2.00 Hrs	
11/10/21	LS	RESEARCH RE PRIMING LIENS AND ADEQUATE PROTECTION REQUIREMENTS UNDER 364(D)	0.20 Hrs	
11/11/21	CY	REVISE REPLY TO DIP OBJECTION.	1.80 Hrs	
11/15/21	CY	CORRESPOND WITH FBR RE DIP MOTION AND ORDER (.3); REVIEW LOAN DOCS RE SAME (.3).	0.60 Hrs	
11/17/21	NFM	DRAFT, PREPARE AND ELECTRONICALLY FILE NOTICE OF ADJOURNMENT OF DIP FINANCING HEARING	1.00 Hrs	
11/19/21	CY	TELEPHONE CONFERENCE WITH JM AND FBR RE DIP ORDER AND AGREEMENT (2.4); REVISE DIP ORDER (1.3)	3.70 Hrs	
11/19/21	FBR	REVIEW OF TRANSCRIPT FROM HEARING OF 11/16 (1.2); REVIEW OF FINAL DIP ORDER AND REVIEW OF DIP LOAN AGREEMENT (1.5)	3.70 Hrs	
11/19/21	NFM	DRAFT NOTICE OF REVISED DIP ORDER AND LOAN AGREEMENT (.8); COORDINATE APPEARANCE AT DIP FINANCING HEARING FOR FRED RINGEL (.2); PREP AND SEND DIP FINANCING PORTION OF HEARING TRANSCRIPT TO FRED RINGEL (.2)	1.20 Hrs	
11/21/21	CY	REVISE NOTICE OF AMENDED DIP ORDER (.2); CORRESPOND WITH FBR AND JM RE AMENDED DIP DOCS (.2); FILE, SERVE, AND SUBMIT SAME TO CHAMBERS (.4).	0.80 Hrs	
11/21/21	FBR	REVIEW AND REVISE BUDGET FOR REVISED DIP FINAL ORDER; EMAIL LEE FOR HIS NUMBERS	0.30 Hrs	
11/21/21	FBR	REVIEW AND REVISE DIP CREDIT AGREEMENT AND DIP FINAL ORDER; REVIEW TRANSCRIPT	4.00 Hrs	
11/22/21	NFM	DRAFT AND ELECTRONICALLY FILED COS FOR CLEMENT YEE FOR DIP LOAN DOCUMENTS	0.80 Hrs	
11/23/21	CY	PREPARE DIP AGREEMENT AND ORDER (.2); SUBMIT SAME (.2).	0.40 Hrs	
11/23/21	FBR	REVIEW AND REVISE DIP ORDER AND DIP LOAN AGREEMENT AND REDLINE	0.80 Hrs	
11/23/21	FBR	RECEIVED AND REVIEW OF EMAIL BUCHWALD RE ENTRY OF DIP ORDER AND REQUEST EXECUTION OF DUIP AGREEMENT TO OBTAIN FUNDING	0.40 Hrs	
01/04/22	FBR	PREPARATION OF FEE RECAP FOR DIP LOAN	0.40 Hrs	
FINANCING Totals			49.70 Hrs	\$27,163.50

LITIGATION

Re: CHAPTER 11

10/16/21	CY	REVIEW MOTION TO TERMINATE EXCLUSIVITY AND CORRESPOND WITH FBR AND SE RE SAME.	0.40 Hrs
10/16/21	SE	REVIEW MOTION TO TERMINATE EXCLUSIVITY (.7)	0.70 Hrs
10/16/21	SE	COMMENCE RESEARCH RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.5)	0.50 Hrs
10/17/21	CY	TELEPHONE CONFERENCE WITH SE RE MOTION TO LIMIT EXCLUSIVITY (.4); RESEARCH RE EXCLUSIVITY ISSUES (1.0).	1.40 Hrs
10/17/21	SE	EMAILS TO AND FROM C. YEE RE MOTION TO TERMINATE EXCLUSIVITY (.2); CALL WITH FRED RINGEL RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.2); CALL [REDACTED] (.5); CALL WITH FRED RINGEL RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.2)' CALL WITH C. YEE RE RESEARCH RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.1)	1.20 Hrs
10/17/21	SE	COMMENCE DRAFTING RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (4.6)	4.60 Hrs
10/17/21	SE	CONTINUE PREPARING FOR RULE 2004 EXAMINATION OF M. LICHTENSTEIN (1.6)	1.60 Hrs
10/18/21	CY	TELEPHONE CONFERENCE WITH SE DEPOSITION EXHIBITS.	0.30 Hrs
10/18/21	CY	CORRESPOND WITH SE RE TERMINATION OF EXCLUSIVITY (.3); RESEARCH RE LIMITATION (2.0).	2.30 Hrs
10/18/21	FBR	REVIEW OF TRANSCRIPT OF LICHTENSTEIN DEPOSITION PART 1	1.50 Hrs
10/18/21	LS	REVIEW MOTION TO LIMIT EXCLUSIVITY	0.20 Hrs
10/18/21	NFM	REVIEW AND REVISE RIDER FOR RESPONSE TO DEVELOPMENT'S MOTION TO LIMIT EXCLUSIVITY PER STEVE EICHEL'S REQUEST	1.50 Hrs
10/18/21	SE	CONTINUE PREPARING FOR RULE 2004 EXAMINATION OF M. LICHTENSTEIN (1.2); TAKE RULE 2004 EXAMINATION OF M. LICHTENSTEIN (3.2)	4.40 Hrs
10/18/21	SE	CONTINUE DRAFTING RESPONSE TO MOTION TO EXTEND EXCLUSIVITY (1.8)	1.80 Hrs
10/19/21	CY	REVIEW TRUSTEE MOTION.	0.20 Hrs
10/19/21	SE	CALL WITH [REDACTED]	0.20 Hrs
10/19/21	SE	WORK ON RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.9);	0.90 Hrs
10/19/21	SE	REVIEW FIRST DAY OF TRANSCRIPT FROM LICHTENSTEIN RULE 2004 TRANSCRIPT (1.6)	1.60 Hrs
10/20/21	CY	TELEPHONE CONFERENCES WITH SE AND FBR RE EXCLUSIVITY ISSUES.	0.40 Hrs
10/20/21	CY	TELEPHONE CONFERENCE WITH LS RE TRUSTEE MOTION.	0.20 Hrs
10/20/21	FBR	TELEPHONE CONFERENCE WITH CLIENTS RE CASE STATUS	1.00 Hrs
10/20/21	LS	TELEPHONE CONFERENCE WITH FBR RE TRUSTEE MOTION AND PREPARING OPPOSITION	0.10 Hrs

Re: CHAPTER 11

10/20/21	LS	REVIEW TRUSTEE MOTION	0.70 Hrs
10/20/21	LS	REVIEW LIMIT EXCLUSIVITY MOTION	0.80 Hrs
10/20/21	SE	CALL WITH FRED RINGEL AND C. YEE (PT OF CALL) RE REVIEW OF RULE 2004 EXAM TRANSCRIPTS AND RESPONDING TO TRUSTEE MOTION, MOTION TO TERMINATE EXCLUSIVITY AND ADDITIONAL MOTIONS TO BE MADE BY DEBTOR (.5)	0.50 Hrs
10/20/21	SE	CONTINUE REVIEW OF M. TRANSCRIPT OF M. LICHTENSTEIN;S RULE 2004 EXAMINATION IN CONNECTION WITH LETTER TO J. NAGI AND RESPONSE TO MOTION TO APPOINT TRUSTEE (1.9)	1.90 Hrs
10/21/21	LS	TELEPHONE CONFERENCE WITH EICHEL RE PREPARING OPP TO MOTION TO APPOINT TRUSTEE	0.60 Hrs
10/21/21	LS	PREPARE OBJECTION TO MOTION TO APPOINT TRUSTEE	0.90 Hrs
10/21/21	SE	CONTINUE REVIEW OF TRANSCRIPT OF M. LICHTENSTEIN'S RULE 2004 EXAMINATION ION CONNECTION WITH LETTER REQUESTING DOCS TO J. NAGI AND OPPOSITION TO MOTION TO TERMINATE EXCLUSIVITY (1.1); REVIEW MOTION TO APPOINT TRUSTEE (.5)	1.60 Hrs
10/21/21	SE	TEL CONF WITH L. SCHWARTZ RE RESPONSE TO MOTION TO APPOINT A TRUSTEE (.5)	0.50 Hrs
10/21/21	SE	COMMENCE REVIEW OF T. MOSKOVITS RULE 2004 TRANSCRIPT (1.8)	1.80 Hrs
10/22/21	LS	RESEARCH RE MOTION FOR APPOINTMENT OF CHAPTER 11 TRUSTEE	0.40 Hrs
10/22/21	LS	PREPARE OBJECTION TO MOTION FOR CHAPTER 11 TRUSTEE	0.50 Hrs
10/22/21	SE	CONTINUE REVIEW OF MOSKOVITS RULE 2004 EXAMINATION TRANSCRIPT (2.6); DRAFT, REVIEW AND REVISE LETTER TO NAGI (1.8)	4.40 Hrs
10/24/21	CY	CORRESPOND WITH [REDACTED]	0.10 Hrs
10/24/21	SE	EMAIL TO AND FROM C. YEE [REDACTED]; REVIEW EMAIL FORM F. RINGEL TO J. NAGI IN RESPONSE TO HIS EMAIL RE PAYOFF LETTER (.1); DRAFT REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE (.2.2)	2.40 Hrs
10/25/21	CY	REVIEW [REDACTED]	0.20 Hrs
10/25/21	CY	RESEARCH EXCLUSIVITY TERMINATION ISSUES (.9); CORRESPOND WITH FBR RE EXCLUSIVITY (.1).	1.00 Hrs
10/25/21	LS	REVIEW MOTION TO LIMIT EXCLUSIVITY, STATE COURT PLEADINGS, TRANSCRIPTS AND OPP TO MTD IN ORDER TO PREPARE OBJECTION TO EXCLUSIVITY AND TRUSTEE MOTIONS	1.90 Hrs
10/25/21	LS	REVIEW TRUSTEE MOTION AND CASES CITED TO DISTINGUISH IN OPP TO TRUSTEE MOTION	0.30 Hrs
10/25/21	LS	REVIEW FORMS OF MOTIONS FOR CHAPTER 11 TRUSTEE AND OBJECTIONS	0.20 Hrs

Re: CHAPTER 11

10/25/21	SE	DRAFT, REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (3.6)	3.60 Hrs
10/25/21	SE	CALL WITH C. YEE RE MOTION TO EXTEND EXCLUSIVITY (.2); CALL WITH C. YEE RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.1)	0.30 Hrs
10/26/21	CY	TELEPHONE CONFERENCE WITH SE RE EXCLUSIVITY TERMINATION ISSUES (.2); RESEARCH RE SAME (.6); REVIEW OBJECTION RE SAME (1.4).	2.20 Hrs
10/26/21	CY	TELEPHONE CONFERENCE WITH FBR RE APPEAL ISSUES (.1); RESEARCH DATES AND RULES FOR COUNTER STATEMENT (.4).	0.50 Hrs
10/26/21	CY	REVIEW HEARING TRANSCRIPT (.3); DRAFT TURNOVER ORDER (1.2).	1.50 Hrs
10/26/21	LS	REVIEW TRANSCRIPT OF MTD AND MARK FOR OBJECTION TO TRUSTEE MOTION	0.80 Hrs
10/26/21	LS	REVIEW MTD AND OPPOSITION TO MTD	0.90 Hrs
10/26/21	SE	CONTINUE DRAFTING AND REVISING RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (2.4)	2.40 Hrs
10/27/21	CY	TELEPHONE CONFERENCE WITH SE RE EXCLUSIVITY ISSUES (.2); DRAFT MOTION TO EXTEND EXCLUSIVITY (3.9)	4.10 Hrs
10/27/21	CY	REVIEW BUCHWALD DECLARATION FOR TURNOVER.	0.20 Hrs
10/27/21	FBR	PREPARATION OF TUROVER ORDER AND BUCHWALD DECLARATION	1.20 Hrs
10/27/21	LS	TELEPHONE CONFERENCE WITH SE RE OPP TO EXCLUSIVITY AND OPP TO TRUSTEE MOTION PREP	0.40 Hrs
10/27/21	LS	PREPARE OPP TO TRUSTEE MOTION	1.90 Hrs
10/27/21	LS	RESEARCH RE STANDING	0.60 Hrs
10/27/21	LS	REVIEW DRAFT OPP TO EXCLUSIVITY MOTION	0.50 Hrs
10/27/21	LS	REVIEW DIP MOTION, SCHEDULES FOR CONTINUED PREP OF OPP TO MOTION FOR TRUSTEE	0.90 Hrs
10/27/21	LS	REVIEW 2004 TRANSCRIPTS FOR CONTINUED PREP OF OPP TO MOTION FOR TRUSTEE	0.70 Hrs
10/27/21	SE	TEL CONF WITH C. YEE RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.2); TEL CONF WITH L. SCHWARTZ RE RESPONSE TO MOTION TO APPOINT A TRUSTEE (.3)	0.50 Hrs
10/27/21	SE	REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (1,8)	1.80 Hrs
10/28/21	CY	REVISE TURNOVER ORDER AND DECLARATION (.4); SUBMIT SAME (.2).	0.60 Hrs
10/28/21	CY	REVIEW LOAN DOCUMENTS.	0.20 Hrs
10/28/21	CY	TELEPHONE CONFERENCES WITH LS RE TRUSTEE OBJECTION.	0.30 Hrs
10/28/21	LS	CONTINUED PREP OF OPP TO TRUSTEE MOTION	2.80 Hrs
10/28/21	LS	REVIEW OPP TO MOTION TO LIMIT EXCLUSIVITY	0.20 Hrs

Re: CHAPTER 11

10/28/21	LS	PREPARE TIMELINE OF DEVELOPMENT PARTICIPATION & OBJECTIONS IN CHAPTER 11 CASE	0.20 Hrs
10/28/21	LS	REVIEW 2004 TRANSCRIPTS	0.30 Hrs
10/28/21	LS	REVIEW CASES CITED IN MOTION FOR CHAPTER 11 TRUSTEE	No Hrs Charge
10/28/21	SE	REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (3.2)	3.20 Hrs
10/29/21	FBR	CALL WITH [REDACTED]	0.50 Hrs
10/29/21	FBR	PREPARATION OF EXCLUSIVITY MOTION AND ORDER	1.20 Hrs
10/29/21	FBR	REVIEW AND REVISE TRUSTEE MOTION AND SEND TO LEE FOR APPROVAL	1.80 Hrs
10/29/21	FBR	REVIEW AND REVISE OPP RO MOTION TO TERMINATE EXCLUSIVIETY--FIRST DRAFT	1.10 Hrs
10/29/21	LS	RESEARCH RE APPOINTMENT OF CHAPTER 11 TRUSTEE	0.80 Hrs
10/29/21	LS	REVIEW AND REVISE OPP TO MOTION TO APPOINT TRUSTEE	2.90 Hrs
10/29/21	LS	REVIEW OPP TO MOTION LIMIT EXCLUSIVITY	0.20 Hrs
10/29/21	LS	EMAILS WITH FBR RE [REDACTED] DISCOVERY DISPUTES AND CONTEMPT ORDER, APPEARANCE BY COUNSEL TO DEVELOPMENT, DEVELOPMENT PLAN AND FUNDING	0.20 Hrs
10/29/21	LS	REVIEW MOTION RE CONTEMPT AND ORDER RE COMPLIANCE WITH 2004	0.30 Hrs
10/29/21	LS	REVIEW MTD TRANSCRIPT	0.40 Hrs
10/29/21	SE	REVIEW AND REVISE MOTION TO TERMINATE EXCLUSIVITY, INCLUDING REVIEW OF TRANSCRIPTS IN CONNECTION WITH PREPARING RESPONSE (5.2)	5.20 Hrs
10/29/21	SE	RESEARCH RE [REDACTED] IN CONNECTION WITH RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (1.2)	1.20 Hrs
10/29/21	SE	EMAIL TO FRED RINGEL RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.1)	0.10 Hrs
11/01/21	AMG	TELEPHONE CONFERENCE WITH FRED RE MOTION FOR TRUSTEE	0.30 Hrs
11/01/21	AMG	REVIEW OF MOTION FOR TRUSTEE	0.70 Hrs
11/01/21	CY	CORRESPOND WITH LS AND FBR RE TRUSTEE MOTION.	0.20 Hrs
11/01/21	FBR	TELEPHONE CONFERENCE WITH LORI REGARDING ISSUES WITH TRUSTEE MOTION AND REWRITE ISSUE	0.30 Hrs
11/01/21	FBR	REVIEW AND REVISE COUNTERSTATEMENT OF ISSUES ON APPEAL	0.40 Hrs
11/01/21	FBR	TELEPHONE CONFERENCE WITH ZOOM CAL [REDACTED]	0.50 Hrs
11/01/21	FBR	,25 BUCHWALD DECLARATION	0.30 Hrs
11/01/21	FBR	REVIEW AND REVISE EXCLUSIVITY MOTION	1.40 Hrs

Re: CHAPTER 11

11/01/21	FBR	REVIEW AND REVISE RESPONSE TO TERMINATION OF EXCLUSIVITY	1.30 Hrs
11/01/21	LS	TELEPHONE CONFERENCE WITH FBR RE OPP TO TRUSTEE MOTION	0.20 Hrs
11/01/21	LS	REVIEW OPP TO MOTION TO LIMIT EXCLUSIVITY	0.20 Hrs
11/01/21	LS	REVIEW OPP TO TRUSTEE MOTION	0.40 Hrs
11/01/21	LS	REVIEW TRUSTEE MOTION RE EQUITY OWNERSHIP CLAIM	0.30 Hrs
11/01/21	LS	TELEPHONE CONFERENCE WITH CY RE REPLY FILING DEADLINE & DESIGNATION OF [REDACTED]	0.20 Hrs
11/01/21	LS	ZOOM CALL WITH [REDACTED]	0.40 Hrs
11/01/21	LS	PREPARE BUCHWALD DECLARATION IN SUPPORT OF OBJECTION TO TRUSTEE MOTION	0.30 Hrs
11/01/21	LS	REVIEW EXCLUSIVITY MOTION AND DIP MOTION	0.30 Hrs
11/01/21	SE	CALL WITH C. YEE RE TIME TO FILE RESPONSES TO MOTION TO TERMINATE EXCLUSIVITY (.1)	0.10 Hrs
11/02/21	FBR	TELEPHONE CONFERENCE WITH LEE RE CHANGING LOCKS ON 286 RIDER	0.30 Hrs
11/02/21	FBR	TELEPHONE CONFERENCE WITH STEVE EICHEL RE CHANGES TO MTOION TO SERMINATE EXCLUSIVITY	0.60 Hrs
11/02/21	LS	TELEPHONE CONFERENCE WITH SE RE EXCLUSIVITY AND TRUSTEE MOTION OBJECTIONS	0.20 Hrs
11/02/21	LS	REVIEW EXCLUSIVITY TERMINATION MOTION [REDACTED]	0.60 Hrs
11/02/21	SE	TEL CONF WITH L. SCHWARTZ RE RESPONSE TO MOTION TO APPOINT TRUSTEE (.1)	0.10 Hrs
11/02/21	SE	TEL CONF WITH F. RINGEL RE REVISIONS TO RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.4); SUBSEQUENT CALL WITH F. RINGEL RE RESPONSE TO MOTION TO APPOINT TRUSTEE BASED ON NEW MOTION FILED BY DEVELOPMENT (.1)	0.50 Hrs
11/02/21	SE	CALL WITH C. YEE RE NEW MOTION TO DISMISS BANKRUPTCY CASE (.1)	0.10 Hrs
11/02/21	SE	REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY	1.40 Hrs
11/03/21	FBR	REVIEW AND REVISE COUNTERSTATEMENTY OF ISSUES ON APPEAL	0.40 Hrs
11/03/21	LS	REVIEW FORM OF SANCTION LETTER, CASES RE DISMISSAL OF 2ND MTD ON RES JUDICATA, COLLATERAL ESTOPPEL AND LAW OF THE CASE PRINCIPLES	0.50 Hrs
11/03/21	LS	INITIAL PREP OF OBJECTION TO MTD	0.30 Hrs
11/03/21	LS	REVIEW OBJECTIONS TO ORIGINAL MTD	0.50 Hrs

Re: CHAPTER 11

11/04/21	CY	REVIEW COUNTERSTATEMENT (1.0); CORRESPOND WITH FBR RE SAME (.2)	1.20 Hrs
11/04/21	CY	TELEPHONE CONFERENCES WITH LS RE PLEDGE AND SANCTIONS.	0.30 Hrs
11/04/21	LS	REVIEW EMAIL RE OPEN ITEMS/PREP OF OBJECTIONS AND COUNTER-STATEMENT OF ISSUES ON APPEAL	0.20 Hrs
11/04/21	LS	TELEPHONE CONFERENCE WITH FBR RE SANCTIONS LETTER AND OPP TO MTD	0.40 Hrs
11/04/21	LS	REVIEW NOTICE OF APPEAL AND STATEMENT OF ISSUES	0.30 Hrs
11/04/21	LS	REVIEW COUNTER-STATEMENT OF ISSUES	0.20 Hrs
11/04/21	LS	BREAKDOWN OF ISSUES RE MTD, RE-ARGUE, APPEAL AND RESPONSES	0.30 Hrs
11/04/21	LS	REVIEW PLEDGE AGREEMENT	0.30 Hrs
11/04/21	LS	RESEARCH RE STRICT FORECLOSURE AND UCC	0.50 Hrs
11/04/21	LS	PREPARE SANCTIONS LETTER	0.40 Hrs
11/04/21	LS	REVIEW TRANSCRIPT OF MTD RE 305 RULING & REFERENCES	0.30 Hrs
11/04/21	LS	PREPARE OUTLINE OF OPP TO 2ND MTD	0.40 Hrs
11/05/21	CY	REVIEW 9011 LETTER.	0.20 Hrs
11/05/21	FBR	REVIEW AND REVISE SANCTION LATTER	0.40 Hrs
11/05/21	FBR	REVIEW AND REVISE TRUSTEE MOTION	1.00 Hrs
11/05/21	FBR	REVIEW AND REVISE OPPOSITION TO MOTION TO TERMINATE EXCLUSIVITY	2.20 Hrs
11/05/21	LS	REVISE SANCTIONS LETTER	0.30 Hrs
11/05/21	LS	EMAILS WITH FBR RE SANCTIONS LETTER	0.20 Hrs
11/05/21	LS	REVIEW AND REVISE OPP TO TRUSTEE MOTION	0.80 Hrs
11/05/21	LS	EMAIL SANCTIONS LETTER TO NAGI AND KUHNS AND COPY TO MOLDOVAN	0.20 Hrs
11/05/21	LS	EMAIL FBR ATTACHING REVISED OPP TO TRUSTEE MOTION	0.20 Hrs
11/05/21	NFM	PREPARE AND ELECTRONICALLY FILE COUNTER STATEMENT FOR NOTICE OF APPEAL (.7); SERVE SAME (.3); ELECTRONICALLY FILE COS FOR SAME (.3)	1.30 Hrs
11/06/21	FBR	REVIEW AND REVISE OPPO TO TERMINATE EXCLUSIVITY; FINAILIZE AND IND DAVE'S CONMMMENTS	1.30 Hrs
11/08/21	CY	REVIEW OBJECTION TO MOTION TO APPOINT TRUSTEE (.7); CORRESPOND WITH LS RE SAME (.1); DRAFT DECLARATION FOR SAME (.5).	1.30 Hrs
11/08/21	CY	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs
11/08/21	FBR	REVIEW AND REVISE OPPOSITION TO MOTION TO TERMINATE EXCLUSIVITY	1.60 Hrs
11/08/21	LS	TELEPHONE CONFERENCE WITH CY 4X RE OPP TO TRUSTEE MOTION	0.20 Hrs

Re: CHAPTER 11

11/08/21	LS	REVIEW MC JOINDER TO OPP TO MOTION TO APPOINT TRUSTEE	0.20 Hrs
11/08/21	LS	REVIEW TRUSTEE OPP REVISIONS	0.30 Hrs
11/08/21	LS	REVIEW DECLARATIONS IN SUPPORT OF EXCLUSIVITY MOTION AND OBJECTION TO MOTION TO APPOINT TRUSTEE	0.20 Hrs
11/08/21	LS	PREPARE SCHEDULE OF MOTIONS, EXHIBITS, DECLARATIONS FOR 11-16 HEARINGS AND ECF FILING	0.20 Hrs
11/08/21	NFM	PREPARE DECLARATION AND EXHIBIT IN SUPPORT OF RESPONSE TO MOTION TO APPOINT TRUSTEE	0.50 Hrs
11/08/21	SE	REVIEW EMAIL FROM FRED RINGEL RE DECLARATION AND DRAFT RESPONSE (.1)	0.10 Hrs
11/09/21	CY	REVIEW OBJECTION TO TRUSTEE (.2); TELEPHONE CONFERENCE WITH LS RE SAME (.1).	0.30 Hrs
11/09/21	CY	CORRESPONDENCES WITH FBR AND LS RE FILING OF MULTIPLE OBJECTIONS (.5); CORRESPOND WITH LEE RE SAME (.1); REVIEW DEVELOPMENT OBJECTIONS (1.8); TELEPHONE CONFERENCE WITH FBR RE SAME (.4).	2.80 Hrs
11/09/21	FBR	REVIEW OF DEVELOPMENTS RESPONSE TO ROSEWOOD RETENTION MOTION (.5); OBJECTION TO DIP FINANCING (0,7); OBJECTION TO INTERIM FEE AWARD (0,5); OBJECTION TO EXCLUSIVITY (0,4); OBJECTION TO BAR DATE (0,3); EMERGENCY MOTION TO VACATE RETENTION (0.5)	2.90 Hrs
11/09/21	FBR	TELEPHONE CONFERENCE [REDACTED]	0.50 Hrs
11/09/21	LS	TELEPHONE CONFERENCE WITH CY 12X RE RESPONSES, OBJECTIONS, DECLARATIONS AND EXHIBITS FOR ECF FILINGS FOR NOV. 16 HEARINGS, BUCHWALD SIGN-OFF AND SERVICE OF VARIOUS PLEADINGS	0.90 Hrs
11/09/21	LS	EMAIL TO NFM RE NOA AND SERVICE ON COJ CREDITOR COUNSEL	0.10 Hrs
11/09/21	LS	REVIEW EMAILS RE OPP TO MOTION TO APPT TRUSTEE, 2ND MTD, LIMIT EXCLUSIVITY, FINAL REVISIONS AND SIGN-OFF ON FILING	0.80 Hrs
11/09/21	LS	FINAL REVIEW OF OPPOSITION DOCS, DECLARATIONS AND EXHIBITS FOR ECF FILING AND SERVICE	1.00 Hrs
11/09/21	LS	REVIEW DOCKET TO TRACK OBJECTIONS, JOINDERS, STATEMENTS IN SUPPORT	0.30 Hrs
11/09/21	LS	REVIEW DEVELOPMENT OBJECTION TO BAR DATE, EXCLUSIVITY, BROKER RETENTION, RB INTERIM FEES, DIP FINANCING AND RB RETENTION	1.20 Hrs
11/09/21	LS	REVIEW COJ JOINDERS TO DEVELOPMENT OBJECTIONS AND IN SUPPORT OF 2ND MTD	0.20 Hrs
11/09/21	LS	REVIEW LENDER JOINDERS/STATEMENTS IN SUPPORT OF DEBTOR PLEADINGS	0.30 Hrs
11/09/21	SE	TEL CONF WITH C. YEE RE MOTIONS FILED TODAY (.1)	0.10 Hrs

Re: CHAPTER 11

11/10/21	CY	TELEPHONE CONFERENCE WITH LS AND FBR RE OMNIBUS REPLY TO DEVELOPMENT OBJECTIONS (1.5); TELEPHONE CONFERENCE WITH LS RE DIVIDING REPLY (.5); REVIEW DEV OBJECTIONS (1.0).	3.00 Hrs
11/10/21	FBR	TELEPHONE CONFERENCE WITH ZOOM MEETING WITH LORI AND CLEMENT REGARDING DRAFTING RESPONSES TO DEVELOPMENTS MOTIONS; ORGANIZATION AND STRUCTURE	No Hrs Charge
11/10/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED] [REDACTED]	0.40 Hrs
11/10/21	LS	CONTINUED REVIEW OF OPPOSITIONS AND JOINDERS TO VARIOUS MOTIONS	1.50 Hrs
11/10/21	LS	ZOOM CALL WITH FBR AND CY RE STRATEGY FOR OMNIBUS RESPONSE, LICHTENSTEIN EMAIL TO BUCHWALD AND AGENDA FOR 11-16 HEARINGS	1.10 Hrs
11/10/21	LS	TELEPHONE CONFERENCE WITH CY 2X RE OMNIBUS RESPONSE TO DEVELOPMENT OBJECTIONS TO FINANCING, BROKER AND RB RETENTION, RB INTERIM FEES, EXCLUSIVITY AND BAR DATE MOTIONS	0.60 Hrs
11/10/21	LS	REVIEW DOCKET RE DECLARATION AND EXHIBITS	0.20 Hrs
11/10/21	LS	REVIEW PRIOR LICHTENSTEIN DECLARATIONS AND EXHIBITS	0.20 Hrs
11/10/21	LS	RESEARCH RE PLEDGE AGREEMENTS	0.20 Hrs
11/10/21	LS	RESEARCH RE SUB-ROSA PLANS	0.20 Hrs
11/10/21	LS	DRAFT OMNIBUS RESPONSE TO OBJECTIONS TO EXCLUSIVITY, RB FEES, RB RETENTION, BAR DATE	0.90 Hrs
11/11/21	CY	DRAFT OMNIBUS REPLY TO DEV. OBJECTIONS.	1.00 Hrs
11/11/21	FBR	PREPARATION OF DRAFT OF OMNIBUS RESPONSE (2.1) AND REVIEW OF ALL RESPONSES (1.4)	3.50 Hrs
11/11/21	FBR	REVIEW OF LENDER'S RESPONSE	1.20 Hrs
11/11/21	LS	CONTINUED PREP OF OMNIBUS RESPONSE	2.90 Hrs
11/11/21	LS	REVIEW AND REVISE OMNIBUS RESPONSE	1.50 Hrs
11/11/21	LS	TELEPHONE CONFERENCE WITH FBR RE OMNIBUS RESPONSE 3X	0.20 Hrs
11/11/21	LS	REVIEW DOCKET RE OBJECTIONS AND JOINDERS	0.20 Hrs
11/11/21	LS	REVIEW DRAFT AGENDA	0.10 Hrs
11/11/21	LS	CONFERENCE WITH CY 3X RE OMNIBUS RESPONSE	0.50 Hrs
11/11/21	LS	REVIEW LENDER OMNIBUS RESPONSE	0.40 Hrs
11/11/21	LS	FURTHER REVISE OMNIBUS RESPONSE	0.80 Hrs
11/11/21	LS	REVIEW DIP AND BROKER OBJECTIONS AND INSERTS INTO OMNIBUS RESPONSE	0.40 Hrs
11/11/21	LS	REVIEW DEVELOPMENT OBJECTIONS TO RECONCILE AND CONFIRM THAT POINTS INCLUDED IN OMNIBUS REPLY ADDRESS ALL OBJECTIONS	1.10 Hrs

Re: CHAPTER 11

11/12/21	CY	REVIEW LENDER RESPONSE TO DEV OBJECTIONS (.3); REVISE OMNIBUS REPLY TO SAME (1.8); CORRESPOND WITH FBR RE SAME (.3).	2.40 Hrs
11/12/21	FBR	REVIEW AND REVISE OMNIBUS REPLY [FINALIZE DRAFT FOR FILING]	4.30 Hrs
11/12/21	FBR	REVIEW OF CORBIN DECLARATION AND DISCUSS DRAFT WITH GREG AND PAUL RUBIN	0.80 Hrs
11/12/21	FBR	REVIEW OF LEE BUCHWALD REVISIONS TO OMNIBUS REPLY AND INCORPORATE SAME	0.50 Hrs
11/12/21	LS	REVIEW AND REVISE OMNIBUS REPLY TO DEVELOPMENT OBJECTIONS	1.80 Hrs
11/12/21	LS	TELEPHONE CONFERENCE WITH CY RE OMNIBUS REPLY REVISIONS AND BROKER DECLARATION	0.20 Hrs
11/12/21	LS	REDLINE OMNIBUS REPLY AND REVIEW PRIOR VERSIONS OF OMNIBUS REPLY TO FINALIZE	0.40 Hrs
11/12/21	LS	REVIEW BUCHWALD EMAIL RE EXPEDITER AND PLANS	0.10 Hrs
11/12/21	LS	REVIEW [REDACTED]	0.30 Hrs
11/12/21	LS	REVIEW OMNIBUS REPLY BY DEBTOR AND LENDER - FINAL/FILED	No Hrs Charge
11/12/21	LS	PREPARE FILES, DRAFTS, NOTES FOR OMNIBUS REPLY	No Hrs Charge
11/14/21	CY	REVIEW FLORIDA COMPLAINT.	0.40 Hrs
11/14/21	FBR	PREPARATION FOR HEARING ON 11/16	3.50 Hrs
11/15/21	CY	REVIEW DEV. REPLY (.3); TELEPHONE CONFERENCE WITH LS RE SAME (.2); REVIEW AGENDA (.1).	0.60 Hrs
11/15/21	CY	REVIEW SUPPLEMENTAL PRODUCTION.	1.80 Hrs
11/15/21	FBR	TELEPHONE CONFERENCE WITH LEE BUCHWALD RE LICHTENSTEIN SUPPLEMENTAL PRODUCTION	0.30 Hrs
11/15/21	FBR	PREPARATION FOR HEARING AND OPPOSITION TO MOTIONS ON MOTION TO DISMISS (1.3); DIP FINANCING (2.5); RETENTION OF BROKER (.7); EXCLUSIVITY (.8); INTERIM FEES (1.2); MOTION TO APPOINT A TRUSTEE(1.0); MOTION TO VACATE RETENTION OF ROBINSON BROG (.5); MOTION TO TERMINATE EXCLUSIVITY REVIEW AND OMNIBUS RESPONSES; PREPARE SCRIPTS AND REVIEW TRANSCRIPTS FROM 8/30 AND 10/5 (2.0)	10.00 Hrs
11/15/21	LS	REVIEW FLORIDA COMPLAINT AND EMAIL CY/FBR RE COMPLAINT (11-14-21)	0.50 Hrs
11/15/21	LS	REVIEW DEVELOPMENT REPLY AND CASES & ARTICLES CITED	1.70 Hrs
11/15/21	LS	TELEPHONE CONFERENCE WITH FBR RE DEVELOPMENT REPLY AND PREP FOR 11/16 HEARINGS	0.50 Hrs
11/15/21	LS	TELEPHONE CONFERENCE WITH CY 2X RE DIP MOTION OBJECTION AND BREAKDOWN OF LENDER CLAIM, DEVELOPMENT REPLY AND PREP FOR 11/16 HEARINGS	0.30 Hrs
11/15/21	LS	REVIEW BREAKDOWN OF LENDER CLAIM AMOUNT IN DIP MOTION	0.10 Hrs

Re: CHAPTER 11

11/15/21	LS	ZOOM CALL WITH [REDACTED]	0.50 Hrs
11/15/21	LS	RESEARCH RE INTERLOCUTORY V. FINAL ORDERS	0.90 Hrs
11/15/21	LS	EMAIL TO FBR & CY RE INTERLOCUTORY V. FINAL ORDERS AND CASE ANALYSIS	0.20 Hrs
11/15/21	LS	REVIEW LICHTENSTEIN AFFIRMATION AND TERM SHEET FILED BY DEVELOPMENT AND EMAILS WITH FBR AND CY RE TERM SHEET AND IMPACT ON 11/16 HEARINGS	0.30 Hrs
11/15/21	LS	REVIEW AND MARK RELEVANT PORTIONS OF MTD AND MTR TRANSCRIPTS FOR 11/16 HEARINGS WITH RESPECT TO DISMISSAL MOTION AND FUNDING AND EMAIL TO FBR AND CY	1.20 Hrs
11/17/21	FBR	REVIEW AND REVISE ALL ORDERS FOR MOTIONS GRANTED/DENIED BY JUDGE BECKERMAN ON THE 16TH; TRANSMIT TO LENDER FOR COMMENTS AFTER REVISIONS	0.70 Hrs
11/17/21	FBR	REVIEW AND REVISE ORDERS TO SUBMIT TO THE COURT (FINAL REVISIONS)	0.50 Hrs
11/18/21	CY	REVIEW ENTERED ORDER DENYING TRUSTEE MOTION.	0.10 Hrs
11/18/21	FBR	REVIEW OF SIX ORDERS SIGNED BY COURT ON 11/18 FOR CHANGES BY COURT AND EMAIL TO BUCHWALD, CORBIN AND COUNSEL AND MOLDOVAN	0.20 Hrs
11/22/21	FBR	TELEPHONE CONFERENCE WITH NAGI, JOYCE AND SPELFOGEL ON WRAPING UP CASE	0.70 Hrs
11/29/21	FBR	REVIEW OF FLORIDA LAWSUIT FOR COMMONALITY OF ISSUES WITH NEW YORK ACTION	0.80 Hrs
11/29/21	NFM	RETRIEVE APPEAL DOCUMENTS OFF PACER AND SAVE TO SYSTEM (.2); UPDATE CALENDAR (.1)	0.30 Hrs
11/29/21	SE	DRAFT (5.0); REVIEW AND REVISE RESPONSE TO MOTION TO PAY CLAMS AND STRUCTURALLY DISMISS BANKRUPTCY CASE (4.2)	9.20 Hrs
11/30/21	FBR	REVIEW OF LENDER'S BRIEF	0.70 Hrs
11/30/21	FBR	TELEPHONE CONFERENCE WITH CORBIN RE 350 GRAND CONCOURSE COMP AND PRESENTATION TO LENDER	0.50 Hrs
11/30/21	SE	CALL WITH FRED RINGEL RE REVISIONS TO BRIEF (.2)	0.20 Hrs
12/02/21	FBR	REVIEW AND REVISE RESPONSE TO STRUCTURED DISMISSAL MOTION	0.80 Hrs
12/02/21	LS	REVIEW RESPONSE & FINAL FOR ECF FILING	0.70 Hrs
12/02/21	LS	REVIEW BE AVIV OBJECTION TO SDM	0.20 Hrs
12/02/21	LS	REVIEW UST OBJECTION TO SDM	0.30 Hrs
12/02/21	SE	REVIEW NOTICE OF FILING OF AMENDED EXHIBIT AND AMENDED EXHIBIT (.2); REVIEW DRAFT RESPONSE TO MOTION FOR STRUCTURAL DISMISSAL (.3)	0.50 Hrs
12/07/21	FBR	REVIEW OF MOTION FOR TRO RE FLORIDA ACTIION	0.70 Hrs
12/10/21	FBR	REVIEW OF CALCULATION OR LENDERS CLAIM (0.2); REVIEW WITH MOLDOVAN (0.3); EMAIL SAME TO KUHNS (0.1)	0.60 Hrs

Re: CHAPTER 11

12/13/21	FBR	PREPARATION OF [REDACTED]	0.70 Hrs
12/13/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED] [REDACTED]	0.60 Hrs
12/15/21	FBR	TELEPHONE CONFERENCE WITH SPELFOGEL REGARDING PAYOFF OF LENDER	0.80 Hrs
12/15/21	LS	TELEPHONE CONFERENCE WITH CY RE 286 LIQ ANALYSIS AND COMBINED HEARING MOTION	0.30 Hrs
12/16/21	CY	TELEPHONE CONFERENCE WITH [REDACTED] [REDACTED]	1.10 Hrs
12/16/21	CY	DRAFT JOINDER TO CONTEMPT MOTION.	0.70 Hrs
12/16/21	FBR	REVIEW OF MOTION REGARDING EXPEDITE APPEAL	1.50 Hrs
12/16/21	FBR	PREPARATION OF LETTER TO JUDGE ABRAMS	1.50 Hrs
12/16/21	LS	REVIEW LETTER MOTION, MOL AND DECLARATION IN SUPPORT TO EXPEDITE APPEAL	1.10 Hrs
12/16/21	LS	TELEPHONE CONFERENCE WITH FBR RE MOTION TO EXPEDITE APPEAL	0.10 Hrs
12/16/21	LS	ZOOM CALL WITH [REDACTED] [REDACTED]	0.40 Hrs
12/16/21	LS	REVIEW DISTRICT COURT DOCKET	0.20 Hrs
12/16/21	LS	REVIEW NOTICE OF APPEAL AND STATEMENT OF ISSUES RE MTR DISMISSAL MOTION	0.30 Hrs
12/16/21	LS	REVIEW OF COUNTER STATEMENT OF ISSUES RE: MTR DISMISSAL MOTION	0.30 Hrs
12/16/21	LS	DRAFT LETTER RESPONSE TO LETTER MOTION TO EXPEDITE APPEAL	0.70 Hrs
12/16/21	NFM	RETRIEVE APPEAL DOCS OFF PACER AND DISTRIBUTE SAME	0.30 Hrs
12/17/21	CY	REVIEW LETTER TO JUDGE ABRAMS (.7); SUBMIT SAME (.2).	0.90 Hrs
12/17/21	FBR	REVIEW OF OSC FILED BY DEVEL;OPMENT AND PARTICIPATE IN HEARING BEFORE DISTRICT JUDGE RONNIE ABRAMS	1.20 Hrs
12/17/21	LS	TELEPHONE CONFERENCE WITH FBR RE RESULTS OF CONFERENCE ON EXPEDITING APPEAL	0.30 Hrs
12/17/21	LS	EMAIL TO NFM RE DATES FOR APPEAL FILINGS	0.20 Hrs
12/17/21	LS	REVIEW FBR REVISIONS TO LETTER SUBMISSION IN OPPOSITION TO EXPEDITING APPEAL	0.20 Hrs
12/17/21	LS	REVISE LETTER RESPONSE RE EXPEDITING APPEAL	0.20 Hrs
12/17/21	LS	REVIEW CY REVISIONS TO LETTER RESPONSE RE EXPEDITING APPEAL	0.10 Hrs
12/17/21	LS	REVIEW VARIOUS EMAILS BETWEEN PARTIES AND ABRAMS CHAMBERS RE: SCHEDULING CONFERENCE REGARDING REQUEST TO EXPEDITE APPEAL	0.30 Hrs
12/17/21	NFM	PREPARE EXHIBITS FOR UPCOMING APPEAL RESPONSE LETTER (.5); ELECTRONICALLY FILE AND SERVE RESPONSE LETTER (.5); UPDATE APPEAL CALENDAR (.5)	1.50 Hrs

Re: CHAPTER 11

12/17/21	SE	REVIEW EMAIL FROM DISTRICT COURT RE HEARING (.1); CONF WITH L. SCHWARTZ RE UPCOMING HEARING(.1); REVISE LETTERS TO COURT RE HEARING (.1)	0.30 Hrs
12/20/21	CY	REVISE JOINDER.	0.10 Hrs
12/20/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.50 Hrs
12/20/21	FBR	REVIEW OF TWO NOTICES OF APPEAL FILED BY DEVELOPMENT [REDACTED]	0.30 Hrs
12/21/21	CY	REVIEW NOTICE OF APPEAL AND CORRESPOND WITH LS RE SAME.	0.30 Hrs
12/21/21	CY	CORRESPOND WITH FBR RE JOINDER.	0.10 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH CLIENT REGARDINF NEW APPEALS AND CASE STATUS	1.00 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH SPELFOGEL RE SETTLEMENT	0.70 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.60 Hrs
12/21/21	FBR	TELEPHONE CONFERENCE WITH SPELFOGEL RE POTENTIAL SETTLEMENT	0.70 Hrs
12/21/21	LS	TELEPHONE CONFERENCE WITH FBR (2X) RE APPELLANT BRIEF AND NEW NOTICES OF APPEAL AND LETTER SUPPLEMENTING RECORD	0.70 Hrs
12/21/21	LS	TELEPHONE CONFERENCE WITH CY 2X RE NOTICES OF APPEAL	0.20 Hrs
12/21/21	LS	RESEARCH RE INTERLOCUTORY V. FINAL ORDERS AND APPELLATE PROCEDURE	0.90 Hrs
12/21/21	LS	REVIEW TRANSCRIPT RE SDM	0.50 Hrs
12/21/21	LS	REVIEW SCHEDULING ORDER	0.10 Hrs
12/21/21	LS	REVIEW LETTER RE SUPPLEMENTING RECORD	0.20 Hrs
12/21/21	LS	REVIEW APPEAL DOCKET	0.10 Hrs
12/21/21	LS	REVIEW MEMO RE EXPEDITING APPEAL	0.30 Hrs
12/21/21	LS	REVIEW FORM OF BRIEF RE APPEAL OF MTR	0.30 Hrs
12/21/21	LS	REVIEW APPELLANT STATEMENT OF ISSUES AND DESIGNATION OF RECORD	0.50 Hrs
12/21/21	LS	REVIEW DEBTOR COUNTER-STATEMENT OF ISSUES AND ADDITIONAL ITEMS FOR DESIGNATION	0.20 Hrs
12/22/21	CY	REVISE JOINDER.	1.60 Hrs
12/22/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs
12/22/21	FBR	REVIEW AND REVISE JOINDER TO CONTEMPT MOTION	0.30 Hrs
12/22/21	FBR	REVIEW AND REVISE SETTLEMENT PROPOSAL	1.50 Hrs
12/22/21	FBR	CORRESPONDENCE SENT FISCHER & MAKOOI	0.40 Hrs

Re: CHAPTER 11

12/22/21	LS	REVIEW APPEAL DOCKET (.1); DESIGNATION AND STATEMENT OF ISSUES (.2); COUNTERSTATEMENT OF ISSUES (.2); PREPARE OUTLINE FOR APPELLEE BRIEF	0.50 Hrs
12/22/21	LS	REVIEW MOTION TO EXPEDITE APPEAL TO PREPARE OUTLINE FOR APPELLEE BRIEF	0.20 Hrs
12/22/21	LS	REVIEW FORM OF APPELLEE BRIEF RE JURISDICTION, STANDARD OF REVIEW, APPEALS OF MTR AND UNDERLYING ORDER	0.60 Hrs
12/22/21	LS	ZOOM CALL RE NOTICES OF APPEAL OF SDM AND BID PROCEDURES ORDER	0.50 Hrs
12/22/21	LS	TELEPHONE CONFERENCE WITH FBR RE NOTICES OF APPEAL, RESPONSE AND PREPARING APPELLEE BRIEF	0.20 Hrs
12/22/21	LS	RESEARCH APPEAL ISSUES	0.70 Hrs
12/23/21	FBR	REVIEW OF RULES ON FILING OF APPENDIX	0.70 Hrs
12/23/21	FBR	REVIEW AND REVISE [REDACTED]	0.60 Hrs
12/23/21	LS	DRAFT SAFE HARBOR LETTER	0.50 Hrs
12/23/21	LS	REVIEW NOTICES OF APPEAL	0.20 Hrs
12/23/21	LS	EMAIL TO FBR & CY ATTACHING SAFE HARBOR LETTER AND LETTER IN OPP TO SUPPLEMENTING RECORD	0.10 Hrs
12/23/21	LS	REVIEW FRBP RE APPEAL, SUPPLEMENTING RECORD & APPENDIX	0.40 Hrs
12/23/21	LS	REVIEW EMAILS RE APPENDIX AND FILING JOINT APPENDIX	0.20 Hrs
12/23/21	LS	REVIEW APPENDIX (.2); REVIEW DOCUMENTS INCLUDED IN APPENDIX (.8) COMPARE CHART WITH DOCUMENTS AND PAGE IDENTIFIERS (.9); RECONCILE CHART WITH APPELLANT DESIGNATION (.3); RECONCILE CHART WITH APPELLEE COUNTER-DESIGNATION (.3)	2.50 Hrs
12/23/21	LS	DRAFT LETTER IN OPP TO APPELLANT SUBMISSION OF SOFA TO SUPPLEMENT RECORD	0.30 Hrs
12/23/21	LS	REVIEW DISTRICT COURT DOCKET RE LETTER SUBMITTING SOFA	0.20 Hrs
12/23/21	LS	REVIEW BANKRUPTCY DOCKET RE STATUS OF APPEALS (.1); DESIGNATION OF RECORD AND STATEMENT OF ISSUES (.2)	0.30 Hrs
12/23/21	LS	REVIEW COUNTER-STATEMENT OF ISSUES	0.20 Hrs
12/23/21	LS	REVIEW FORM OF APPELLATE BRIEF	0.30 Hrs
12/23/21	LS	REVIEW FRBP RE TIMING FOR FILING DESIGNATION/STATEMENT OF ISSUES	0.20 Hrs
12/23/21	NFM	PREPARE AND ELECTRONICALLY FILE APPEAL LETTER	0.50 Hrs
12/24/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.40 Hrs

Re: CHAPTER 11

12/24/21	FBR	REVIEW AND REVISE [REDACTED]	0.60 Hrs
12/24/21	FBR	REVIEW AND REVISE RULE 11 SAFE HARBOR LETTER	1.00 Hrs
12/24/21	FBR	REVIEW OF REVISED SETTLEMENT AGREEMENT (0.3); EMAIL [REDACTED]	0.40 Hrs
12/24/21	LS	EMAILS WITH FBR RE SAFE HARBOR LETTER AND DISMISSAL OF ADDITIONAL APPEALS	0.20 Hrs
12/24/21	LS	REVIEW AND REVISE SAFE HARBOR LETTER	0.20 Hrs
12/24/21	LS	EMAIL DEVELOPMENT COUNSEL ATTACHING SAFE HARBOR LETTER	0.10 Hrs
12/26/21	LS	REVIEW APPELLANT BRIEF	1.20 Hrs
12/26/21	LS	REVIEW APPENDIX	0.80 Hrs
12/26/21	LS	REVIEW STATEMENT OF ISSUES AND RECONCILE WITH BRIEF	0.20 Hrs
12/26/21	LS	EMAILS WITH FBR RE APPELLANT BRIEF AND ISSUES TO RESEARCH	0.20 Hrs
12/27/21	CY	REVIEW APPEAL BRIEF.	0.30 Hrs
12/27/21	FBR	TELEPHONE CONFERENCE [REDACTED]	0.30 Hrs
12/27/21	FBR	TELEPHONE CONFERENCE [REDACTED]	0.70 Hrs
12/27/21	FBR	TELEPHONE CONFERENCE [REDACTED]	0.60 Hrs
12/27/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.40 Hrs
12/27/21	FBR	ATTENTION TO [REDACTED]	1.10 Hrs
12/27/21	LS	EMAIL WITH FBR RE APPELLEE BRIEF AND ISSUES ON APPEAL	0.10 Hrs
12/27/21	LS	REVIEW NMM EMAIL AND CASES RE APPELLATE PROCEDURE AND ISSUES ON APPEAL	0.50 Hrs
12/27/21	LS	TELEPHONE CONFERENCE WITH FBR RE APPELLEE BRIEF	0.30 Hrs
12/27/21	LS	TELEPHONE CONFERENCE WITH CY RE APPELLEE BRIEF PREP	0.30 Hrs
12/27/21	LS	REVIEW APPELLANT BRIEF	0.80 Hrs
12/27/21	LS	DRAFT APPELLEE BRIEF	1.30 Hrs
12/27/21	LS	REVIEW MTR	0.60 Hrs
12/27/21	LS	REVIEW DEBTOR OPP TO MTR	0.60 Hrs
12/27/21	LS	REVIEW LENDER OPP TO MTR	0.40 Hrs
12/27/21	LS	REVIEW MOTION TO DISMISS	0.50 Hrs
12/27/21	NFM	RETRIEVE APPEAL DOCS FROM PACER AND SAVE TO SYSTEM	0.30 Hrs

Re: CHAPTER 11

12/27/21	NMM	RESEARCHED PENALTIES FOR VIOLATION OF RULE 8009 OF FEDERAL RULES OF BANKRUPTCY APPELLATE PROCEDURE AND EMAIL CORRESPONDENCE WITH FBR ANALYZING RESEARCH (2.6); TELEPHONE CALLS (X2) WITH FBR REGARDING RESEARCH (0.9).	3.50 Hrs
12/28/21	FBR	PREPARATION OF [REDACTED]	2.00 Hrs
12/28/21	FBR	TELEPHONE CONFERENCE [REDACTED]	2.00 Hrs
12/28/21	FBR	REVIEW OF REDEMPTION REQUEST AND REVIEW OF APPLICABLE UCC PROVISIONS	0.80 Hrs
12/28/21	LS	PREPARE PRELIMINARY STATEMENT	0.90 Hrs
12/28/21	LS	REVIEW DEBTOR OPP TO MTD	0.50 Hrs
12/28/21	LS	REVIEW LENDER OPP TO MTD	0.50 Hrs
12/28/21	LS	REVIEW DISTRICT COURT DECISIONS RE BANKRUPTCY APPEALS OF MTR	0.50 Hrs
12/28/21	LS	REVIEW APPELLANT BRIEF	0.80 Hrs
12/28/21	LS	REVIEW CASES RE APPELLATE PROCEDURE AND COURT DISCRETION ON REMEDY FOR FAILURE TO FOLLOW FRAP	0.50 Hrs
12/28/21	LS	CONTINUED PREP OF APPELLEE BRIEF RE MTR	1.60 Hrs
12/29/21	CY	CORRESPOND WITH NFM RE JOINDER TO CONTEMPT (.1); REVISE SAME (.1).	0.20 Hrs
12/29/21	FBR	PREPARATION FOR HEARING ON DISCLOSURE STATEMENT	1.00 Hrs
12/29/21	FBR	LITIGATION / COURT APPEARANCE HEARING ON DISCLOSURE STATEMENT	0.70 Hrs
12/29/21	FBR	REVIEW AND REVISE DISCLOSURE STATEMENT PER JUDGE BECKERMAN;S INSTRUCTIONS	2.10 Hrs
12/29/21	FBR	REVIEW AND REVISE PLAN TO CONFORM TO DISCLOSURE STATEMENT	1.60 Hrs
12/29/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.50 Hrs
12/29/21	LS	DRAFTING OF APPELLEE BRIEF	2.80 Hrs
12/29/21	LS	REVIEW ORIGINAL DISMISSAL MOTION AND MTR	1.20 Hrs
12/29/21	LS	REVIEW CASES RE ISSUES ON APPEAL AND COMPLIANCE WITH FRAP	0.30 Hrs
12/29/21	LS	REVIEW FRAP RE REQUIREMENTS FOR APPELLEE BRIEF	0.20 Hrs
12/29/21	LS	REVIEW APPELLANT BRIEF FACT SECTION TO DETERMINE IF FACT SECTION REQUIRED IN APPELLEE BRIEF	0.40 Hrs
12/29/21	LS	REVIEW DISTRICT COURT DECISION RE APPEAL OF MTR BANKRUPTCY ORDER	0.30 Hrs
12/29/21	LS	TELEPHONE CONFERENCE WITH FBR RE BRIEF STATUS, ISSUES ON APPEAL, DISMISSAL ORDER V. MTR ORDER	0.60 Hrs

Re: CHAPTER 11

12/29/21	LS	TELEPHONE CONFERENCE WITH CY 2X RE D.S. REVISIONS AND STATUS OF APPEALS	0.20 Hrs
12/29/21	LS	REVIEW ECF BOUNCES RE NEW MOTIONS REGARDING TERMINATING EXCLUSIVITY AND FOR PAYOFF	0.20 Hrs
12/29/21	SE	EMAIL TO FRED RINGEL RE DRAFTINBG RESPOSNE TO ONE OF MOTIONS FILED TODAY (.1)	0.10 Hrs
12/30/21	CY	REVIEW DEVELOPMENT MOTIONS.	0.40 Hrs
12/30/21	CY	DARFT SUPPLEMENTAL JOINDER TO CONTEMPT.	1.50 Hrs
12/30/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] TION TO TERMINATE EXCLUSIVITY AND EXHIBITS	2.20 Hrs
12/30/21	FBR	REVIEW OF [REDACTED]	3.40 Hrs
12/30/21	LS	REVIEW MTST	0.10 Hrs
12/30/21	LS	REVIEW MOTION FOR PAYOFF OF LENDER CLAIM	0.50 Hrs
12/30/21	LS	REVIEW MOTION TO TERMINATE EXCLUSIVITY	0.40 Hrs
12/30/21	LS	REVIEW LETTERS IN OPP TO MTST	0.20 Hrs
12/30/21	LS	COMPARE COMMITMENT LETTERS RE CURRENT MOTION TO SDM	0.20 Hrs
12/30/21	LS	TELEPHONE CONFERENCE WITH CY 2X RE MTST, MOTION FOR PAYOFF & MOTION TO LIMIT EXCLUSIVITY	0.30 Hrs
12/30/21	LS	CONTINUED DRAFTING OF APPELLATE BRIEF	1.80 Hrs
12/30/21	LS	REVIEW PRIOR PLEADINGS FOR UPDATED FACT SECTION IN BRIEF	0.60 Hrs
12/30/21	SE	EMAILS TO AND FROM FRED RINGEL RE RESPONSE TO MOTIONS FIELD BY DEVELOPMENT WITH RESPECT TO EXCLUSIVITY AND SHORTENING EXCLUSIVITY (.1)	0.10 Hrs
12/30/21	SE	REVIEW MOTION CONFIRMING DISPUTED PAYOFF AMOUNTS (1.2);	1.20 Hrs
12/31/21	CY	CORRESPOND WITH FBR RE RESPONSE TO PAYOFF.	0.10 Hrs
01/01/22	CY	REVIEW PAYOFF MOTION AND PLAN (.9); TELEPHONE CONFERENCE WITH LS RE SAME (.2); DRAFT OBJECTION TO SAME (3.6).	4.70 Hrs
01/02/22	CY	TELEPHONE CONFERENCE WITH SE RE DEVELOPMENT PLAN.	0.10 Hrs
01/02/22	CY	DRAFT OBJECTION TO PAYOFF MOTION (1.3); TELEPHONE CONFERENCE WITH LS RE SAME (.2)	1.50 Hrs
01/02/22	LS	PREPARE APPELLEE BRIEF	2.60 Hrs
01/02/22	LS	REVIEW DEVELOPMENT APPENDIX	0.50 Hrs
01/02/22	LS	REVIEW SUPPLEMENTAL APPENDIX	0.20 Hrs
01/02/22	LS	REVIEW TRANSCRIPT 11-16	0.50 Hrs

Re: CHAPTER 11

01/02/22	LS	COMPARE 11-16 TRANSCRIPT TO MTR TRANSCRIPT	0.30 Hrs
01/02/22	LS	TELEPHONE CONFERENCE WITH CY 2X RE OPP TO MOTION FOR PAY-OFF OF LENDER 2X	0.50 Hrs
01/02/22	LS	REVIEW OPP TO MOTION FOR PAY-OFF OF LENDER	0.30 Hrs
01/03/22	CY	REVIEW SCHEDULING ORDER FOR PAYOFF MOTION (.1); REVISE OBJECTION TO SAME (1.4).	1.50 Hrs
01/03/22	FBR	TELEPHONE CONFERENCE WITH SE EXCLUSIVITY RESPONSE	0.50 Hrs
01/03/22	FBR	REVIEW AND REVISE FURTHER REVISIONS TO RESPONSE TO PAYOFF MOTION	1.50 Hrs
01/03/22	LS	TELEPHONE CONFERENCE WITH CY RE OPPOSITION TO PAY-OFF MOTION	0.10 Hrs
01/03/22	LS	REVIEW PAY-OFF MOTION	0.20 Hrs
01/03/22	LS	REVIEW MOTION TO TERMINATE EXCLUSIVITY	0.20 Hrs
01/03/22	LS	REVIEW OPP TO TERMINATE EXCLUSIVITY MOTION	0.20 Hrs
01/03/22	LS	REVIEW SCHEDULING ORDER	0.10 Hrs
01/03/22	LS	CONTINUED PREP OF APPELLATE BRIEF	2.80 Hrs
01/03/22	LS	REVIEW APPELLANTS' BRIEF	0.90 Hrs
01/03/22	LS	REVIEW FIRST MOTION TO DISMISS	0.40 Hrs
01/03/22	LS	REVIEW TRANSCRIPT OF HEARING ON FIRST MTD TO MARK FOR REFERENCES IN APPELLATE BRIEF	0.90 Hrs
01/03/22	LS	RECONCILE BANKRUPTCY DOCKET, APPELLANT'S DESIGNATION OF RECORD AND APPENDIX AND DEBTOR/LENDER DESIGNATION TO PREPARE DOCS FOR APPENDIX	1.10 Hrs
01/03/22	LS	REVIEW AND REVISE OPP TO PAY-OFF MOTION	0.20 Hrs
01/04/22	CY	REVISE JOINDER TO PAYOFF OBJECTION (1.3); FILE AND SERVE SAME (.4).	1.70 Hrs
01/04/22	CY	REVISE LETTER RE PROTECTIVE ORDER (.3); FILE AND SUBMIT SAME (.2).	0.50 Hrs
01/04/22	FBR	PREPARATION OF LETTER TO COURT REGARDING PROTECTIVE ORDER	1.00 Hrs
01/04/22	FBR	PREPARATION FOR HEARING SCHEDULED FOR 1/5	2.00 Hrs
01/04/22	LS	REVIEW DESIGNATION AND STATEMENT OF ISSUES RE: BID PROCEDURES APPEAL	0.10 Hrs
01/04/22	LS	CONTINUED PREP OF APPEAL BRIEF	2.20 Hrs
01/04/22	LS	REVIEW CORRESPONDENCE OPPOSING MOTION TO EXPEDITE APPEAL	0.20 Hrs
01/04/22	LS	REVIEW DEVELOPMENT LETTER MOTION TO EXPEDITE APPEAL AND SUPPLEMENT RECORD	0.40 Hrs
01/04/22	LS	REVIEW DEVELOPMENT LETTER MOTION TO EXPEDITE APPEAL AND SUPPLEMENT RECORD	0.40 Hrs
01/04/22	LS	RESEARCH RE CASES ON ISSUES ON APPEAL, PRESERVATION OF ISSUES AND WAIVER OF ISSUES	0.50 Hrs

Re: CHAPTER 11

01/04/22	LS	REVIEW MTR	0.60 Hrs
01/04/22	LS	REVIEW TRANSCRIPT OF MTR TO MARK FOR REFERENCES IN APPELLATE BRIEF	0.90 Hrs
01/04/22	LS	REVIEW OPP TO MTR DEBTOR (.6) AND BE AVIV (.4)	1.00 Hrs
01/04/22	NFM	UPDATE CALENDAR	0.30 Hrs
01/05/22	AMG	REVIEW OF LETTER RE PROTECTIVE ORDER	0.30 Hrs
01/05/22	CY	REVIEW NEW COMMITMENT LETTER.	0.10 Hrs
01/05/22	CY	REVIEW OBJECTION TO DEVELOPMENT PLAN MOTION.	0.40 Hrs
01/05/22	FBR	LITIGATION / COURT APPEARANCE HEARING HELD ON JANUARY 5TH	3.50 Hrs
01/05/22	LS	CONTINUED PREP OF APPELLEE BRIEF	2.80 Hrs
01/05/22	LS	REVIEW AND REVISE BRIEF	0.80 Hrs
01/05/22	LS	REVIEW APPELLANT'S BRIEF	0.70 Hrs
01/05/22	LS	PREPARE REVISED STATEMENT OF CASE	0.30 Hrs
01/05/22	LS	REVIEW PLEADINGS FOR PLEDGE AGT, ASSIGNMENT OF INTERESTS, DEFAULT LETTERS AND LOAN DOC REFERENCES	0.80 Hrs
01/05/22	LS	UPDATE LIST OF DOCS FOR APPENDIX	0.20 Hrs
01/05/22	LS	RESEARCH RE WAIVING ISSUES ON APPEAL, RECORD ON APPEAL, SUPPLEMENTING RECORD ON APPEAL	0.60 Hrs
01/05/22	LS	RECONCILE TRANSCRIPT QUOTES IN BRIEF FOR ACCURACY	1.10 Hrs
01/05/22	LS	REVIEW MTD AND MTR FOR ARGUMENTS IN BRIEF	0.50 Hrs
01/05/22	LS	EMAIL FBR ATTACHING DRAFT BRIEF	0.20 Hrs
01/06/22	FBR	REVIEW OF COURT ORDER RE MOSKOVITS AND LICHTENSTEIN	0.10 Hrs
01/06/22	FBR	REVIEW AND REVISE APPELLATE BRIEF ON APPEAL OF RECONSIDERATION MOTION	2.70 Hrs
01/06/22	LS	REVIEW AND REVISE APPELLATE BRIEF	2.10 Hrs
01/06/22	LS	TELEPHONE CONFERENCE WITH FBR RE REVISING BRIEF	0.80 Hrs
01/06/22	LS	REVIEW FRBP AND JUDGE ABRAMS INDIVIDUAL RULES RE FORM OF BRIEF, SUBMISSION, COVID RULES RE COPIES AND ARGUMENT	0.40 Hrs
01/06/22	LS	EMAILS WITH NFM RE APPENDIX	0.20 Hrs
01/06/22	LS	REVIEW APPELLANT APPENDIX	0.50 Hrs
01/06/22	LS	UPDATE LIST OF DOCS FOR APPENDIX	0.30 Hrs
01/06/22	LS	REVIEW NOVEMBER 16TH TRANSCRIPT	0.30 Hrs
01/06/22	LS	REVIEW MTD AND MTR TRANSCRIPTS RE REFERENCES TO MEMBERSHIP INTEREST	0.90 Hrs
01/06/22	NFM	REVIEW AND PREPARE PDF OF APPENDIX DOCUMENTS	1.00 Hrs
01/07/22	FBR	TELEPHONE CONFERENCE WITH CORBIN RE MOSES FRUEND STALKING HORESE	0.40 Hrs
01/07/22	FBR	REVIEW AND REVISE APPELLEE BRIEF	3.50 Hrs

Re: CHAPTER 11

01/07/22	LS	REVIEW AND REVISE BRIEF	1.10 Hrs
01/07/22	LS	REVIEW APPELLANT'S APPENDIX DOCS (.8); REVIEW CHART FOR APPELLEE APPENDIX (.3); UPDATE APPENDIX DOCS (.2)	1.30 Hrs
01/07/22	LS	REVIEW APPELLANT BRIEF RE APPENDIX CITES/REFERENCES	0.20 Hrs
01/07/22	LS	REVIEW ABRAMS' INDIVIDUAL RULES, SDNY LOCAL RULES RE BANKRUPTCY APPEALS	0.30 Hrs
01/07/22	LS	RESEARCH RE: STATEMENT OF ISSUES/DESIGNATION/WAIVER/PRESERVING ARGUMENT FOR APPEAL	0.80 Hrs
01/07/22	LS	PREPARE INSERT RE OPP TO SUPPLEMENTING RECORD	0.40 Hrs
01/07/22	LS	REVIEW MTR TRANSCRIPT RE REFERENCES TO OWNERSHIP OF MEMBERSHIP INTERESTS	0.30 Hrs
01/07/22	LS	EMAIL FBR ATTACHING RIDER TO ARGUMENT RE SUPPLEMENTING RECORD	0.10 Hrs
01/07/22	LS	EMAILS WITH NFM RE APPENDIX PREP	0.20 Hrs
01/07/22	LS	TELEPHONE CONFERENCE WITH NFM 5X RE PREPARING APPENDIX	0.50 Hrs
01/07/22	LS	REVIEW APPENDIX COVERSHEET/CHART AS UPDATED TO INCLUDE PAGE DESIGNATIONS	0.20 Hrs
01/07/22	LS	EMAILS WITH LENDER COUNSEL RE APPENDIX AND DOCS INCLUDED	0.20 Hrs
01/07/22	LS	REVIEW ZIP FILE WITH NFM FOR INCLUSION IN APPENDIX AND CIRCULATING TO COUNSEL	0.20 Hrs
01/07/22	LS	RECONCILE BRIEF WITH APPENDIX REFERENCES AND BEGIN INSERTING CITES TO APPENDIX	0.40 Hrs
01/07/22	LS	REVIEW FRAP AND FRBP RE APPENDIX, FILING APPENDIX, CITES TO APPENDIX, PROPER CITATION FORM FOR TRANSCRIPTS	0.40 Hrs
01/07/22	LS	REVIEW 11-16 TRANSCRIPT	0.30 Hrs
01/07/22	LS	REVIEW DOCKET RE STATEMENT OF ISSUES ON APPEAL OF BID PROCEDURES AND SDM	0.20 Hrs
01/07/22	NFM	REVIEW AND PREPARE APPENDIX DOCUMENTS INTO PDF FILES (5.7); TELEPHONE CONFERENCES WITH LORI SCHWARTZ REGARDING SAME (.5)	6.20 Hrs
01/09/22	FBR	REVIEW AND REVISE APPELLE -DEBTOR BRIEF	3.20 Hrs
01/09/22	FBR	REVIEW AND REVISE LENDER BRIEF	2.00 Hrs
01/09/22	LS	TELEPHONE CONFERENCE WITH FBR 2X RE APPELLATE BRIEF AND ADDITIONAL REVISIONS	0.50 Hrs
01/09/22	LS	REVIEW BE AVIV APPELLATE BRIEF	0.90 Hrs
01/09/22	LS	REVIEW DEBTOR UPDATED BRIEF	0.70 Hrs
01/09/22	LS	REVIEW AND REVISE DEBTOR BRIEF	0.90 Hrs
01/09/22	LS	VARIOUS EMAILS WITH LENDER COUNSEL RE APPENDIX (.2); RE-SENDING APPENDIX DOCS (.2) AND PREPARING SCHEDULE OF APPENDIX DOCS (.2)	0.60 Hrs

Re: CHAPTER 11

01/09/22	LS	REVIEW APPENDIX AND INSERT CITES IN BRIEF	1.00 Hrs
01/10/22	LS	REVIEW APPENDIX (.3) EMAILS WITH LENDER COUNSEL RE APPENDIX (.2); TELEPHONE CONFERENCE WITH NFM RE APPENDIX CITES (.1)	0.60 Hrs
01/10/22	LS	TELEPHONE CONFERENCE WITH NFM RE BRIEF STATUS, FILING BRIEF AND SERVICE OF BRIEF	0.20 Hrs
01/10/22	LS	TELEPHONE CONFERENCE WITH FBR 2X RE REVISING BRIEF	0.40 Hrs
01/10/22	LS	EMAILS WITH BB RE BRIEF FORMAT, PREPARING TOA AND TOC, PROPER CITATIONS TO CASES, TRANSCRIPTS AND STATUTES	0.70 Hrs
01/10/22	LS	REVIEW FORM OF TOA RE STATUTE CITATION	0.20 Hrs
01/10/22	LS	REVIEW & RECONCILE TOC AND TOA WITH BRIEF	1.20 Hrs
01/10/22	LS	REVIEW AND REVISE BRIEF - FINAL FOR TOC AND TOA PREP	0.90 Hrs
01/10/22	LS	REVIEW BRIEF RE WORD COUNT FOR CERTIFICATION (.2) AND REVIEW BANKRUPTCY RULES RE BRIEF FORMAT AND PAGE/WORD LIMITS (.2)	0.40 Hrs
01/10/22	LS	REVIEW SCHEDULING ORDER (.1) RE FILING DEADLINE; TELEPHONE CONFERENCE WITH FBR AND JM RE FILING DEADLINE (.1)	0.30 Hrs
01/10/22	LS	REVIEW SDNY ECF FILING RULES RE SERVICE OF PLEADINGS	0.20 Hrs
01/10/22	LS	EMAILS TO BUCHWALD, MOLDOVAN, SPELFOGEL ATTACHING APPELLEE BRIEF	0.20 Hrs
01/10/22	LS	REVIEW ABRAMS' RULES RE COURTESY COPIES	0.10 Hrs
01/10/22	NFM	REVIEW, PREPARE AND FINALIZE PDFS FOR APPEAL BRIEF AND APPENDIX (2.0); ELECTRONICALLY FILE SAME (1.0)	3.00 Hrs
01/11/22	CY	TELEPHONE CONFERENCE WITH LS RE APPEAL.	0.10 Hrs
01/11/22	FBR	TELEPHONE CONFERENCE WITH STATUS CALL WITH CLIENTS REGARDING CASE AND SALE	1.00 Hrs
01/11/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.80 Hrs
01/11/22	LS	REVIEW DESIGNATION AND STATEMENT OF ISSUES RE BID PROCEDURES ORDER	0.40 Hrs
01/11/22	LS	PREPARE OUTLINE OF COUNTER-DESIGNATION	0.20 Hrs
01/11/22	LS	REVIEW SAFE HARBOR LETTER RE APPEAL OF BPO	0.20 Hrs
01/11/22	LS	REVIEW BANKRUPTCY DOCKET AND DISTRICT COURT DOCKET RE STATEMENT OF ISSUES ON SDM	0.30 Hrs
01/11/22	LS	REVIEW FORM OF MOTION TO DISMISS APPEAL OF INTERLOCUTORY ORDER	0.20 Hrs
01/11/22	LS	REVIEW FRBP RE FAILURE TO FILE DESIGNATION	0.20 Hrs
01/11/22	LS	REVIEW PEABODY ENERGY DOCKET, PLEADINGS, MOTION FOR LEAVE TO APPEAL & ORDER RE APPEAL	0.70 Hrs
01/11/22	LS	REVIEW DEVELOPMENT NOTICE OF PAYOFF OF LENDER	0.30 Hrs
01/11/22	NFM	RETRIEVE DOCUMENTS FROM PEABODY BANKRUPTCY FOR UPCOMING APPENDIX FOR SECOND APPEAL	0.50 Hrs

Re: CHAPTER 11

01/12/22	FBR	LITIGATION / COURT APPEARANCE HEARING ON PAYOFF MOTION AND AUCTION ISSUES	2.70 Hrs
01/12/22	FBR	PREPARATION FOR HEARING ON PAYOFF MOTION AND AUCTION ISASUES	1.60 Hrs
01/12/22	FBR	REVIEW OF REPLY BRIEF AND START PREP FOR HEARING	1.50 Hrs
01/12/22	LS	REVISE DESIGNATION AND ISSUE STATEMENT FOR APPEAL OF BID PROCEDURES ORDER	0.80 Hrs
01/12/22	LS	REVIEW TRANSCRIPT OF HEARING ON BPO	0.90 Hrs
01/12/22	LS	REVIEW APPELLANT DESIGNATION ON BPO APPEAL	0.30 Hrs
01/12/22	LS	REVIEW DC DOCKET RE ASSIGNMENT OF INDEX NUMBER	0.20 Hrs
01/12/22	LS	REVIEW BANKRUPTCY DOCKET FOR ITEMS TO INCLUDE IN COUNTER-DESIGNATION	0.70 Hrs
01/12/22	LS	REVIEW BPO	0.10 Hrs
01/12/22	LS	REVIEW DIP FINANCING TRANSCRIPTS RE CREDIT BID PROVISIONS	0.70 Hrs
01/12/22	LS	REVIEW APPELLANT REPLY BRIEF	0.40 Hrs
01/12/22	LS	REVIEW APPENDICES FOR DOCS REQUESTED BY FBR TO REFER TO AT DISTRICT COURT ARGUMENT	0.80 Hrs
01/12/22	NFM	REVIEW JUDGE RONNIE ABRAMS LOCAL RULES RE TELEPHONIC HEARINGS (.1); DOWNLOAD APPEAL SCHEDULING ORDER (.2); UPDATE CALENDAR (.3)	0.60 Hrs
01/13/22	FBR	RECEIVED AND REVIEW OF EMAIL FROM JUDGE ABRAMS CHAMBERS RE LINK FOR ORAL ARGUMENT AND CHECK TEAMS MEETING SOFTWARE	0.30 Hrs
01/13/22	FBR	PREPARATION FOR ARGUMENT ON APPEAL	3.10 Hrs
01/13/22	FBR	LITIGATION / COURT APPEARANCE ARGUE APPEAL BEFORE DISTRICT JUDGE ABRAMS (0.8); CONFERENCE WITH LEE RE STATUS	0.50 Hrs
01/13/22	LS	REVIEW APPENDIX FOR CITES FOR FBR REFERENCE AT DISTRICT COURT ARGUMENT	1.30 Hrs
01/13/22	LS	REVIEW TRANSCRIPTS RE OPERATING AGREEMENT REFERENCES	0.80 Hrs
01/13/22	LS	REVIEW DOCKET RE OPERATING AGREEMENT REFERENCES	0.20 Hrs
01/13/22	LS	EMAILS WITH FBR RE APPENDIX, OPERATING AGREEMENT AND PLEDGE AGREEMENT	0.20 Hrs
01/13/22	LS	TELEPHONE CONFERENCE WITH FBR RE APPELLANT REPLY BRIEF AND ARGUMENT ON APPEAL	0.30 Hrs
01/14/22	FBR	REVIEW OF REMAND ORDER AND DISCUSS IMPACT	0.40 Hrs
01/14/22	LS	TELEPHONE CONFERENCE WITH FBR RE DESIGNATION AND MOTION TO DISMISS APPEAL OF BPO AND SDM	0.30 Hrs
01/14/22	LS	REVIEW ABRAMS' ORDER REMANDING MATTER TO BANKRUPTCY COURT	0.20 Hrs

Re: CHAPTER 11

01/14/22	LS	REVIEW SCHEDULING ORDER RE PAYOFF AND RECONCILE WITH CALENDAR	0.20 Hrs
01/14/22	NFM	RETRIEVE APPEAL REMAND ORDER OFF PACER AND DISTRIBUTE SAME	0.30 Hrs
01/17/22	FBR	REVIEW AND REVISE DESIGNATION OF ISSUES ON APPEAL OF BID PROCEDURES ORDER AND ADDITIONAL ITEMS TO BE INCLUDED IN RECORD	2.30 Hrs
01/18/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	2.00 Hrs
01/18/22	LS	REVIEW AND REVISE DESIGNATION/COUNTER-STATEMENT OF ISSUES	0.40 Hrs
01/18/22	LS	EMAILS WITH NFM RE STATUS OF DESIGNATION, FILING DESIGNATION AND SERVICE PARTIES	0.20 Hrs
01/18/22	LS	TELEPHONE CONFERENCE WITH FBR 2X RE DESIGNATION	0.60 Hrs
01/18/22	LS	REVIEW DEVELOPMENT BID TERMS	0.20 Hrs
01/18/22	NFM	PREPARE AND ELECTRONICALLY FILE COUNTER DESIGNATION (.5); SERVE SAME (.3)	0.80 Hrs
01/19/22	FBR	REVIEW OF LETRTER FROM NAGI TI JUDGE BECKERMAN	0.50 Hrs
01/19/22	NFM	DRAFT, PREPARE AND ELECTRONICALLY FILE COS FOR APPEAL COUNTER DESIGNATION	0.50 Hrs
01/20/22	FBR	REVIEW OF 1/12 TRANSCRIPT (0.8), NAGI LETTER (0.4) AND PREPARE DRAFT RESPONSE TO NAGI LETTER (1.1)	2.30 Hrs
01/20/22	LS	REVIEW LETTER RE DEMAND FOR LENDER PAYMENT BREAKDOWN AND DEBTOR FEES	0.20 Hrs
01/20/22	LS	REVIEW FORM OF MOTION TO DISMISS APPEAL OF INTERLOCUTORY ORDER	0.20 Hrs
01/20/22	LS	REVIEW DISTRICT COURT DOCKET RE APPEAL INDEX NOS/JUDGE ASSIGNMENTS	0.20 Hrs
01/20/22	LS	PREPARE APPEAL FILE FOR OFFICE	No Hrs Charge
01/21/22	FBR	LITIGATION / COURT APPEARANCE HEARING RE STATUS CONFERENCE	1.50 Hrs
01/24/22	FBR	TELEPHONE CONFERENCE WITH PAUL RUBIN REGARDING ROSEWOOD FEES AS ADMIN EXPENSE	0.50 Hrs
01/24/22	FBR	PREPARATION OF EMAIL TO NAGI IN ACCORDANCE WITH COURT STATUS ORDER	0.30 Hrs
01/24/22	FBR	PREPARATION OF EMAIL NOLDOVAN REGARDING QQUESTION ON OUTSTANDING FEES	0.10 Hrs
01/25/22	FBR	TELEPHONE CONFERENCE WITH GREG ZIPES, DOUG SPELFOGEL, JOE MOLDOVAN RE DISMISSAL VS PLAN	0.90 Hrs
01/25/22	LS	TELEPHONE CONFERENCE WITH FBR RE PENDING APPEALS	0.20 Hrs

Re: CHAPTER 11

01/25/22	LS	REVIEW FRBP AND FRAP, LOCAL SDNY RULES, APPEAL DOCKETS, FORMS OF BRIEFS RE DISMISSING APPEALS	1.40 Hrs
01/27/22	CY	REVIEW DEVELOPMENT SUPPLEMENT (.3); TELEPHONE CONFERENCE WITH FBR, LS RE SAME (1.9); TELEPHONE CONFERENCE WITH LS RE SAME (.2); DRAFT AMENDED PLAN (1.2).	3.60 Hrs
01/27/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	1.30 Hrs
01/27/22	FBR	TELEPHONE CONFERENCE WITH LS AND CY REFINING ISSUES FOR RESPONSE TO SUPPLEMENT AND REVISIONS TO PLAN AND ASSIGNING RESPONSIBILITY FOR WORK	0.70 Hrs
01/27/22	LS	REVIEW SUPPLEMENT TO PAY OFF MOTION	0.80 Hrs
01/27/22	LS	TELEPHONE CONFERENCE WITH CY 2X RE PAYOFF MOTION SUPPLEMENT AND RESPONSE	0.40 Hrs
01/27/22	LS	TELEPHONE CONFERENCE WITH FBR RE PREPARING RESPONSE TO PAYOFF SUPPLEMENT	0.10 Hrs
01/27/22	LS	ZOOM CALL WITH FBR & CY RE PREPARING RESPONSE TO SUPPLEMENT TO PAYOFF MOTION	0.90 Hrs
01/27/22	LS	REVIEW EMAILS RE PROFESSIONAL FEE PAYMENT AND ADMIN OBLIGATIONS BREAKDOWN	0.20 Hrs
01/27/22	LS	REVIEW NOTES RE OPP TO PAYOFF MOTION	0.50 Hrs
01/27/22	LS	REVIEW PREVIOUS OPP TO PAYOFF MOTION	0.30 Hrs
01/27/22	LS	PULL 1/5/2022 AND 1/12/2022 TRANSCRIPTS FOR REVIEW IN PREP OF RESPONSE TO SUPP TO PAYOFF MOTION	0.20 Hrs
01/27/22	SE	REVIEW EMAIL FROM GREG ZIPES RE DEVELOPMENT'S SUPPLEMENT TO PAY OFF MOTION	0.10 Hrs
01/28/22	CY	TELEPHONE CONFERENCE WITH LS RE PAYOFF OBJECTION (.2); REVISE SAME (.6).	0.80 Hrs
01/28/22	FBR	TELEPHONE CONFERENCE WITH MOLDOVAN REGARDING ADJOURNMENT OF CONFIRMATION	0.30 Hrs
01/28/22	FBR	REVIEW AND REVISE PLAN OF REORGANIZATION	1.30 Hrs
01/28/22	FBR	TELEPHONE CONFERENCE WITH DOUG SPELFOGEL RE ADMINISTRATIVE CLAIMS	0.50 Hrs
01/28/22	FBR	REVIEW OF REVISED ORDER RE SUPPLEMENT	0.50 Hrs
01/28/22	LS	REVIEW SUPPLEMENT TO PAY OFF MOTION	0.80 Hrs
01/28/22	LS	REVIEW REVISED ORDER RE PAYOFF MOTION	0.20 Hrs
01/28/22	LS	TELEPHONE CONFERENCE WITH FBR RE OPP TO PAYOFF SUPPLEMENT	0.40 Hrs
01/28/22	LS	TELEPHONE CONFERENCE WITH CY RE OPP TO PAYOFF SUPPLEMENT	0.30 Hrs
01/28/22	LS	PREPARE RESPONSE TO SUPPLEMENT TO PAYOFF MOTION	1.90 Hrs
01/28/22	LS	REVIEW DOCKET RE DEVELOPMENT PRIOR MOTIONS AND OBJECTIONS	0.30 Hrs

Re: CHAPTER 11

01/29/22	CY	RESEARCH DESIGNATEION.	0.30 Hrs
01/29/22	LS	EMAIL FBR RE RESEARCH FOR OPP TO PAYOFF	0.10 Hrs
01/29/22	LS	REVIEW 1/5/22 TRANSCRIPT AND MARK FOR USE IN OPP TO PAYOFF MOTION	0.90 Hrs
01/29/22	LS	REVIEW 1/12/22 TRANSCRIPT AND MARK FOR USE IN OPP TO PAYOFF MOTION	1.10 Hrs
01/29/22	LS	REVIEW ORIGINAL PAYOFF MOTION	0.40 Hrs
01/29/22	LS	REVIEW DEBTOR OBJECTION TO PAYOFF MOTION	0.20 Hrs
01/29/22	LS	REVIEW BE AVIV TO PAYOFF MOTION	0.30 Hrs
01/29/22	LS	REVIEW PAYOFF NOTICE	0.20 Hrs
01/29/22	LS	RECONCILE SUPPLEMENT FOOTNOTE RE UNPAID ADMIN WITH NOTES RE ADMIN AFTER APPLICATION OF RETAINER, DIP PAYMENT AND PROF ESCROW	0.40 Hrs
01/29/22	LS	REVIEW NYC GOV FOR TAX ACCOUNT INFO AND RECONCILE WITH PAYMENT RECEIPT ATTACHED TO SUPPLEMENT TO PAYOFF MOTION	0.30 Hrs
01/29/22	LS	CONTINUED PREP OF DEBTOR RESPONSE TO SUPP TO PAYOFF MOTION	4.20 Hrs
01/29/22	LS	REVIEW AND REVISE DEBTOR RESPONSE TO SUPP TO PAYOFF MOTION	1.20 Hrs
01/29/22	LS	EMAIL FBR & CY ATTACHING DRAFT OF DEBTOR RESPONSE TO SUPPLEMENT PAYOFF MOTION	0.10 Hrs
01/30/22	LS	TELEPHONE CONFERENCE WITH FBR RE RESPONSE TO SUPPLEMENT TO PAYOFF MOTION AND INSERT RE DESIGNATION OF VOTES	0.30 Hrs
01/30/22	LS	PREPARE INSERT RE DESIGNATION OF VOTE.4 REVIEW CASES AND MOTIONS RE 1126(E) AND DESIGNATING VOTES	1.10 Hrs
01/30/22	LS	REVIEW CASES RE DESIGNATION OF VOTES	0.40 Hrs
01/30/22	LS	REVIEW 1126 PROVISIONS RE DESIGNATING VOTES	0.20 Hrs
01/30/22	LS	EMAIL FBR RE STATUS OF OPP TO PAYOFF MOTION AND PLAN STATUS	0.10 Hrs
01/31/22	FBR	LITIGATION / COURT APPEARANCE STATUS CONFERENCE REQUESTED BY UST	1.50 Hrs
01/31/22	LS	REVIEW CALENDAR RE UPCOMING HEARINGS AND DEADLINES	0.20 Hrs
01/31/22	LS	REVIEW UST OBJECTION TO DISMISSAL/PAYOFF MOTION	0.30 Hrs
02/01/22	CY	TELEPHONE CONFERENCE WITH LS RE PAYOFF OBJECTION ISSUES.	0.20 Hrs
02/01/22	FBR	LITIGATION / COURT APPEARANCE STATUS CONFERENCE REGARDING US TRUSTEE REQUEST ON PAYOFF MOTION	1.50 Hrs
02/01/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED] [REDACTED]	0.10 Hrs
02/01/22	LS	TELEPHONE CONFERENCE WITH FBR RE STATUS CONFERENCE, REVISING RESPONSE TO PAYOFF MOTION	0.40 Hrs

Re: CHAPTER 11

02/01/22	LS	REVIEW RESPONSE TO PAYOFF MOTION	0.30 Hrs
02/03/22	LS	REVIEW FBR EMAIL RE 1126 AND REVISIONS TO OBJECT TO PAYOFF TO INCORPORATE ADDITIONAL 1126 ARGUMENTS	0.10 Hrs
02/03/22	LS	REVIEW AND REVISE RESPONSE TO PAYOFF MOTION SUPPLEMENT	2.80 Hrs
02/03/22	LS	REVIEW EMAILS WITH [REDACTED]	0.20 Hrs
02/03/22	LS	TELEPHONE CONFERENCE WITH FBR RE REVISIONS TO RESPONSE TO PAYOFF MOTION	0.30 Hrs
02/04/22	FBR	REVIEW AND REVISE RESPONSE TO SUPPLEMENT FILED BY DEVELOPMENT	1.70 Hrs
02/04/22	LS	REVIEW EMAILS RE REVISIONS TO RESPONSE TO PAYOFF SUPPLEMENT	0.20 Hrs
02/04/22	LS	TELEPHONE CONFERENCE WITH FBR RE REVISIONS TO RESPONSE TO PAYOFF SUPPLEMENT	0.10 Hrs
02/04/22	LS	EMAILS WITH NFM RE FILING AND SERVING RESPONSE AND EXHIBIT	0.20 Hrs
02/04/22	LS	REVISE RESPONSE TO PAYOFF SUPPLEMENT	2.70 Hrs
02/04/22	LS	REVIEW UST OBJECTION TO PAYOFF SUPPLEMENT	0.20 Hrs
02/04/22	LS	REVIEW DEVELOPMENT DRAFT OBJECTION TO PAYOFF SUPPLEMENT	0.20 Hrs
02/04/22	LS	REVIEW ROSEWOOD OBJECTION TO PAYOFF MOTION	0.30 Hrs
02/08/22	CY	REVIEW DEVELOPMENT PAYOFF RESPONSE.	0.20 Hrs
02/08/22	FBR	TELEPHONE CONFERENCE WITH ZOOM CONFERENCE WITH CLIENT RE REQUIREMENT TO POST FUNDS	0.40 Hrs
02/08/22	FBR	REVIEW OF OMNIBUS REPLY TO OBJECTIONS TO SUPPLEMENT AND MAKE NOTES FOR RESPONSE	1.50 Hrs
02/08/22	LS	REVIEW DEVELOPMENT RESPONSE TO OBJECTION TO PAY-OFF SUPPLEMENT	0.60 Hrs
02/09/22	CY	TELEPHONE CONFERENCE WITH FBR RE OBJECTIONS TO PAYOFF MOTION.	0.40 Hrs
02/09/22	FBR	REVIEW OF RESPONSES TO SUPPLEMENT AND TRANSCRIPTS OF 1/12 AND 2/1 STATUS CONFERENCE	2.00 Hrs
02/09/22	FBR	PREPARATION FOR HEARING	1.40 Hrs
02/09/22	FBR	REVIEW OF /MOTION TO DISMISS (THIRD MOTION	1.40 Hrs
02/10/22	CY	REVIEW RENEWED MOTION TO DISMISS.	0.20 Hrs
02/10/22	FBR	LITIGATION / COURT APPEARANCE HEARING ON PAYOFF MOTION	4.50 Hrs
02/11/22	CY	TELEPHONE CONFERENCE WITH FBR RE PAYOFF ISSUES.	0.20 Hrs
02/11/22	FBR	REVIEW OF ORDER ENTERED BY COURT AND [REDACTED]	0.40 Hrs
02/11/22	FBR	TELEPHONE CONFERENCE WITH CY REGARDING PREP OF ORDER FOR RETURN OF DEPOSIT	0.20 Hrs

Re: CHAPTER 11

02/11/22	FBR	TELEPHONE CONFERENCE WITH LEE BUCHWALD REGARDING NEXT STEPS FOR STALKING HORSE (0.2) [REDACTED] [REDACTED]	0.50 Hrs
02/14/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED] [REDACTED]	0.70 Hrs
02/17/22	LS	REVIEW CONTEMPT ORDER	0.20 Hrs
02/17/22	LS	REVIEW TWITTER, LINKEDIN, REAL DEAL RE TM COMMENTS & POSTS	1.20 Hrs
02/17/22	LS	EMAILS WITH FBR RE CONTEMPT & SANCTIONS	0.20 Hrs
02/17/22	LS	REVIEW TRANSCRIPT RE CONTEMPT	0.40 Hrs
02/17/22	LS	REVIEW FILES, FORMS FOR SANCTIONS MOTION	0.30 Hrs
02/18/22	FBR	REVIEW OF LENDER LETTER TO JUDGE BECKERMAN	0.50 Hrs
02/18/22	FBR	PREPARATION OF LETTER TO JUDGE BECKERMAN REGARDING ISSUES WITH FEBRUARY 11TH COURT ORDER	2.40 Hrs
02/18/22	FBR	PREPARATION OF EMAIL [REDACTED] [REDACTED]	0.20 Hrs
02/18/22	LS	ZOOM CALL WITH [REDACTED] [REDACTED]	0.40 Hrs
02/18/22	LS	REVIEW CORRESPONDENCE TO CHAMBERS RE CONTEMPT ORDER AND PAYOFF ORDER	0.20 Hrs
02/18/22	LS	TELEPHONE CONFERENCE WITH CY 2X RE 286 PAY-OFF ORDER	0.20 Hrs
02/18/22	LS	REVIEW AMENDED PAY-OFF ORDER	0.20 Hrs
02/18/22	LS	EMAIL CY RE REVISIONS TO AMENDED PAYOFF ORDER	0.10 Hrs
02/21/22	FBR	PREPARATION OF LETTER TO JUDGE BECKERMAN	2.40 Hrs
02/21/22	FBR	REVIEW AND REVISE LETTER TOO JUDGE BECKERMAN REGARDING FEB 11TH ORDER	0.50 Hrs
02/21/22	LS	REVIEW LETTERS REQUESTING CASE CONFERENCE - DEBTOR & LENDER	0.20 Hrs
02/21/22	LS	REVIEW MOTION DISCHARGING RB AS COUNSEL	0.30 Hrs
02/21/22	LS	TELEPHONE CONFERENCE WITH FBR RE LETTER FOR ECF RE MOSKOVITS AND PAY-OFF ORDER	0.10 Hrs
02/21/22	LS	FILE CORRESPONDENCE REQUESTING CONFERENCE RE MOSKOVITS AND PAY-OFF ORDER	0.20 Hrs
02/22/22	SE	CALL WITH FRED RINGEL RE PREPARING MOTION FOR RECONSIDERATION OF FEB 11TH ORDER (.2); EMAIL TO NATE RE OBTAINING DOCUMENTS RE MOTION FOR RECONSIDERATION (.1)	0.30 Hrs
02/23/22	SE	COMMENCE DRAFTING MOTION FOR RECONSIDERATION (1.9)	1.90 Hrs
02/23/22	SE	REVIEW PLEADINGS, LETTERS TO COURT AND ORDERS IN CONNECTION WITH PREPARING MOTION FOR RECONSIDERATION	1.70 Hrs
02/24/22	FBR	TELEPHONE CONFERENCE WITH JOE, DAVE REGARDING RECONSIDERATION MOTION	0.70 Hrs

Re: CHAPTER 11

02/24/22	LS	REVIEW JOINDER TO DEVELOPMENT MOTION TO DISCHARGE RB	0.10 Hrs
02/24/22	LS	TELEPHONE CONFERENCE WITH EICHEL RE MOTION TO RE-ARGUE & RECONSIDER	0.10 Hrs
02/24/22	LS	REVIEW FILES RE MOTION FOR TRO/PRELIMINARY INJUNCTION & STAY PENDING APPEAL	0.30 Hrs
02/24/22	SE	DRAFT, REVIEW AND REVISE MOTION FOR RECONSIDERATION (11.2)	11.20 Hrs
02/24/22	SE	TEL CONF WITH FRED RINGEL RE PREPARING MOTION FOR RECONSIDERATION	0.60 Hrs
02/24/22	SE	REVIEW CASES THAT REFLECT RULE 9023 ON STAYING UNDERLYING ORDER (.2); EMAIL TO FRED RINGEL RE SAME	0.30 Hrs
02/24/22	SE	CALL WITH [REDACTED]	0.60 Hrs
02/24/22	SE	REVIEW TRANSCRIPT IN CONNECTION WITH MOTION FOR RECONSIDERATION	0.50 Hrs
02/24/22	SE	RESEARACH IN CONNECION WITH MOTION FOR RECONSIDERATION (.6)	0.60 Hrs
02/24/22	SE	EMAIL DRAFT OF MOTION FOR RECONSIDERATION TO F. RINGEL, L. SCHWARTZ AND LEE BUCHWALD	0.10 Hrs
02/25/22	FBR	REVIEW AND REVISE RECONSIDERATION MOTION OF 2/11 ORDER	0.70 Hrs
02/25/22	LS	REVIEW MOTION TO RE-ARGUE 2-11-22 PAYOFF ORDER	0.30 Hrs
02/25/22	LS	REVIEW LOCAL RULES AND FRBP RE RE-ARGUMENT MOTION, FORM OF ORDER AND SERVICE	0.20 Hrs
02/25/22	LS	REVIEW BE AVIV ACCOUNTING AND MOTION TO RE-ARGUE	0.20 Hrs
02/25/22	SE	REVIEW EMAILS [REDACTED]	0.60 Hrs
02/25/22	SE	REVIEW ALL COMMENTS TO MOTION FOR RECONSIDERATION (.5); DRAFT, REVIEW AND REVISE MOTION FOR RECONSIDERATION BASED ON ALL COMMENTS RECEIVED (2.0)	2.50 Hrs
02/25/22	SE	TEL CONF WITH [REDACTED]	0.20 Hrs
02/25/22	SE	ANALYZE ISSUES RE MOTION OR RECONSIDERATION	0.60 Hrs
02/28/22	LS	TELEPHONE CONFERENCE WITH CY RE MOTION TO REARGUE & CASE CONFERENCE	0.10 Hrs
03/01/22	FBR	REVIEW OF [REDACTED]	1.20 Hrs
03/01/22	FBR	TELEPHONE CONFERENCE [REDACTED]	0.50 Hrs

Re: CHAPTER 11

03/01/22	FBR	TELEPHONE CONFERENCE WITH ZIPES RE STATUS CONFERENCE	0.30 Hrs
03/01/22	FBR	REVIEW OF CLAIMS AND STIPULATIONS ACCOMPANYING SUPPLEMENT	0.70 Hrs
03/01/22	LS	REVIEW EXAMINER REPORT AND MOSKOVITS/LICHTENSTEIN RESPONSE	No Hrs Charge
03/02/22	FBR	LITIGATION / COURT APPEARANCE STATUS CONFERENCE AND CHANGE OF SCHEDULE	2.50 Hrs
03/02/22	FBR	TELEPHONE CONFERENCE [REDACTED]	1.10 Hrs
03/03/22	FBR	REVIEW OF SCHEDULING ORDER ON REMAND AND ENTER INTO CALENDAR	0.20 Hrs
03/03/22	FBR	REVIEW AND REVISE DATES REGARDING 2/11 ORDER	0.20 Hrs
03/03/22	LS	REVIEW SCHEDULING ORDER RE MTR/REMAND	0.10 Hrs
03/03/22	LS	REVIEW ORDER AND AMENDED ORDER RE PAY-OFF MOTION	0.10 Hrs
03/03/22	NFM	RETRIEVE APPEAL DOCS FROM FILES FOR STEVE EICHEL	0.20 Hrs
03/03/22	SE	REVIEW COURT ORDERS RE MOSKLOVITZ POST, AND SCHEDULING OF FILING PAPERS (.1); REVIEW EMAIL FROM FBR RE FILING RESPONSE TO MOTION TO REMAND (.1); TEL CONFERENCE WITH FRED RINGEL RE FILING RESPONSE TO UPCOMING MOTION TO REMAND (.1)	0.30 Hrs
03/04/22	LS	TELEPHONE CONFERENCE WITH CY RE FILING DEADLINES, PREPARING RESPONSES, FEE APP AND ADMINISTRATIVE CLAIM MOTION STATUS	0.30 Hrs
03/07/22	LS	CONFERENCE WITH SE RE REMAND/APPEAL ON MTR AND PREPARING RESPONSE	0.20 Hrs
03/07/22	SE	TEL CONF WITH L. SCHWARTZ RE MOTION TO REMAND ORDER DENYING MOTION FOR RECONSIDERATION	0.20 Hrs
03/07/22	SE	COMMENCE REVIEW OF COURT PLEADINGS IN CONNECTION WITH RESPONSE TO MOTION TO REMAND ORDER DENYING MOTION FOR RECONSIDERATION	1.10 Hrs
03/07/22	SE	COMMENCE PREPARING RESPONSE BRIEF BASED ON REVIEW OF DISTRICT COURT PAPERS	1.40 Hrs
03/08/22	LS	REVIEW 2004 APP LICHTENSTEIN AND MOSKOVITZ IN SEIGEL BANKRUPTCY	0.20 Hrs
03/08/22	LS	REVIEW SCHEDULING ORDER RE DEADLINES	0.20 Hrs
03/08/22	SE	CONTINUE REVIEW OF COURT PAPERS AND TRANSCRIPTS (.8) AND DRAFTING RESPONSE TO MOTION TO REMAND TO BANKRUPTCY COURT (1.2)	2.00 Hrs
03/09/22	FBR	REVIEW OF RESPONSE TO RECONSIDERATION MOTION	0.60 Hrs
03/09/22	LS	REVIEW DEVELOPMENT RESPONSE TO RECONSIDERATION MOTION	0.30 Hrs
03/09/22	SE	WORK ON RESPONSE TO REMAND MOTION	1.20 Hrs

Re: CHAPTER 11

03/09/22	SE	REVIEW EMAIL FROM FRED RINGEL RE PREPARING A REPLY TO DEVELOPMENT'S RESPONSE TO DEBTOR'S MOTION FOR RECONSIDERATION (.1); COMMENCE REVIEW OF DEVELOPMENT'S RESPONSE TO MOTION FOR RECONSIDERATION (.9); COMMENCE DRAFTING REPLY TO RESPONSE TO MOTION FOR RECONSIDERATION (2.6); EMAIL TO AND FROM FRED RINGEL RE REPLY TO RESPONSE TO MOTION FOR CONSIDERATION (.2)	3.80 Hrs
03/10/22	CY	CORRESPOND WITH FBR RE REPLY TO PAYOFF DOCUMENTS.	0.20 Hrs
03/10/22	FBR	PREPARATION OF REPLY TO RECONSIDERATION MOTION	0.60 Hrs
03/10/22	FBR	REVIEW AND REVISE REPLY TO RECONSIDERATION	0.40 Hrs
03/10/22	SE	REVIEW AND REVISE REPLY TO RESPONSE TO MOTION TO RECONSIDER FEBRUARY 11TH ORDER (2.0); CALL WITH FRED RINGEL RE REPLY (.1); EMAIL TO FRED RINGEL RE DRAFT REPLY (.1); SUBSEQUENT CALL WITH FRED RINGEL RE REPLY (.2); CALL WITH C. YEE RE FILING REDACTED TIME ENTRIES UNDER SEAL (.1); REVIEW REVISED RESPONSE TO MOTION TO RECONSIDER FEBRUARY 11TH ORDER (.2)	2.70 Hrs
03/11/22	CY	REVISE REPLY TO MOTION TO RECONSIDER (.6); PREPARE EXHIBITS TO SAME (.4); CORRESPOND WITH NFM RE SERVICE AND FILING (.2).	1.20 Hrs
03/11/22	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs
LITIGATION Totals			553.10 Hrs \$342,002.50

MEETINGS OF CREDITORS/STATUS HEARINGS

10/26/21	CY	CORRESPOND WITH FBR RE 341 MEETING.	0.10 Hrs
11/15/21	CY	TELEPHONE CONFERENCE WITH FBR RE 11/16 HEARING (.1); REVIEW PAPERS AND PREPARE FOR HEARING (2.7).	2.80 Hrs
11/16/21	CY	PREPARE FOR HEARING (1.0); ATTEND OMNIBUS HEARING (4.5); TELEPHONE CONFERENCE WITH FBR RE SAME (.2)	5.70 Hrs
11/16/21	FBR	LITIGATION / COURT APPEARANCE ON MOTION TO DISMISS,, DIP FINANCING, RETENTION OF BROKER, EXCLUSIVITY, INTERIM FEES, MOTION TO APPOINT A TRUSTEE, MOTION TO VACATE RETENTION OF ROBINSON BROG, MOTION TO TERMINATE EXCLUSIVITY, AND OMNIBUS RESPONSES AND PREPARE SCRIPTS AND REVIEW TRANSCRIPTS FROM 8/30 AND 10/5	6.50 Hrs
11/23/21	FBR	LITIGATION / COURT APPEARANCE HEARING ON DIP FINANCING	2.70 Hrs
12/10/21	CY	CORRESPOND WITH LEE AND FBR RE 341.	0.20 Hrs
12/13/21	CY	CORRESPOND WITH LEE AND FBR RE 341.	0.30 Hrs
12/14/21	CY	TELEPHONE CONFERENCE WITH FBR AND LEE RE 341 MEETING.	1.00 Hrs
12/14/21	FBR	TELEPHONE CONFERENCE WITH BE-AVIV REGARDING CASE STATUS	0.80 Hrs
12/15/21	CY	CORRESPOND WITH LEE RE 341 MEETING.	0.20 Hrs
12/16/21	CY	CORRESPOND WITH LEE RE 341 MEETING (.2); PARTICIPATE IN SAME (1.1)	1.30 Hrs

Re: CHAPTER 11

01/05/22	CY	PREPARE FOR AND ATTEND HEARING.	3.40 Hrs	
01/12/22	CY	ATTEND HEARING (2.3); FOLLOW UP WITH LS RE SAME (.2)	2.50 Hrs	
MEETINGS OF CREDITORS/STATUS HEARINGS Totals			27.50 Hrs	\$15,930.50
<u>PLAN AND DISCLOSURE STATEMENT</u>				
10/24/21	CY	CORRESPOND WITH SE RE EXCLUSIVITY ISSUES.	0.20 Hrs	
10/28/21	CY	REVISE EXCLUSIVITY MOTION.	0.50 Hrs	
10/28/21	SE	REVIEW MOTION TO EXTEND EXCLUSIVE PERIODS (.2)	0.20 Hrs	
10/29/21	CY	TELEPHONE CONFERENCE WITH FBR RE EXCLUSIVITY (.1); REVISE SAME (.5); CORRESPOND WITH LB RE SAME (.2);	0.70 Hrs	
10/29/21	LS	TELEPHONE CONFERENCE WITH CY RE EXCLUSIVITY MOTION AND DIP MOTION AND MILESTONES	0.20 Hrs	
10/29/21	LS	REVIEW EXCLUSIVITY MOTION	0.20 Hrs	
11/01/21	CY	TELEPHONE CONFERENCE WITH SE AND FBR RE EXCLUSIVITY (.2); CORRESPOND WITH FBR RE SAME (.2); REVIEW HEARING TRANSCRIPT (.6); REVISE EXCLUSIVITY MOTION (.3); CORRESPOND WITH NFM RE FILING (.1)	1.40 Hrs	
11/01/21	NFM	DRAFT NOTICE OF HEARING FOR EXCLUSIVITY MOTION	0.50 Hrs	
11/02/21	CY	REVISE EXCLUSIVITY MOTION.	0.30 Hrs	
11/02/21	NFM	PREPARE AND ELECTRONICALLY FILE MOTION TO EXTEND EXCLUSIVITY (.7); PREPARE AND SERVE SAME (.3); SEND OUT COURTESY COPY (.2)	1.20 Hrs	
11/03/21	CY	TELEPHONE CONFERENCES WITH FBR AND LS RE MOTION TO DISMISS.	0.50 Hrs	
11/03/21	NFM	PREPARE AND ELECTRONICALLY FILE COS FOR EXCLUSIVITY MOTION	0.50 Hrs	
11/03/21	SE	REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (3.3)	3.30 Hrs	
11/04/21	NFM	DRAFT FRED RINGEL DECLARATION IN SUPPORT OF RESPONSE TO TERMINATE EXCLUSIVITY (1.0); PREPARE EXHIBITS FOR SAME (1.5);	2.50 Hrs	
11/04/21	SE	REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (1.6); REVIEW AND REVISE RINGEL DECLARATION (.3); EMAILS TO F. RINGEL RE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY AND ACCOMPANYING DECLARATION (.1)	2.00 Hrs	
11/05/21	CY	DRAFT PLAN (4.0); TELEPHONE CONFERENCES WITH LS RE PLAN ISSUES (.4).	4.40 Hrs	
11/08/21	CY	DRAFT PLAN.	1.60 Hrs	
11/09/21	CY	REVISE DISCLOSURE STATEMENT.	1.30 Hrs	
11/09/21	NFM	PREPARE AND ELECTRONICALLY FILE DEBTOR'S RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY AND DECLARATION (1.0); SERVE SAME (.3)	1.30 Hrs	

Re: CHAPTER 11

11/11/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.30 Hrs
11/18/21	CY	REVIEW ENTERED ORDER EXTENDING EXCLUSIVITY AND ORDER DENYING EXCLUSIVITY TERMINATION.	0.10 Hrs
11/30/21	CY	DRAFT PLAN.	2.60 Hrs
12/01/21	CY	DRAFT DISCLOSURE STATEMENT (2.0); DRAFT PLAN (1.5).	3.50 Hrs
12/02/21	CY	DRAFT DISCLOSURE STATEMENT AND PLAN.	2.20 Hrs
12/03/21	CY	CORRESPOND WITH FBR RE STRUCTURED DISMISSAL.	0.10 Hrs
12/03/21	CY	DRAFT DS MOTION AND ORDER (1.8); CORRESPOND WITH LS RE SALES UNDER A PLAN (.3).	2.10 Hrs
12/03/21	LS	TELEPHONE CONFERENCE WITH CY RE DISCO APPROVAL MOTION PREP	0.20 Hrs
12/06/21	CY	REVISE DISCLOSURE STATEMENT (1.4); REVIEW DIP AGREEMENT (.2).	1.60 Hrs
12/07/21	CY	REVISE DISCLOSURE STATEMENT.	0.40 Hrs
12/09/21	CY	DRAFT COMBINED HEARING MOTION.	1.30 Hrs
12/10/21	CY	REVISE DISCLOSURE STATEMENT.	1.00 Hrs
12/10/21	CY	REVISE PLAN AND DISCLOSURE STATEMENT (.5); REVISE COMBINED HEARING MOTION (.5)	1.00 Hrs
12/10/21	NFM	DRAFT BALLOTS AND NON-VOTING NOTICE	1.50 Hrs
12/10/21	RMS	TELEPHONE CONFERENCE WITH CY RE PLAN PROVISIONS & CLASSIFICATION ISSUE	0.20 Hrs
12/13/21	CY	CORRESPOND WITH FBR RE PLAN (.1); REVISE PLAN AND DISCLOSURE STATEMENT (1.0); DRAFT COMBINED HEARING MOTION (.8); CORRESPOND WITH MORRISON COHEN RE PLAN PROCESS (.2).	2.10 Hrs
12/13/21	FBR	REVIEW AND REVISE PLAN OF REORGANIZATION	2.50 Hrs
12/13/21	FBR	REVIEW AND REVISE DISCLOSURE STATEMENT	1.90 Hrs
12/14/21	CY	CORRESPOND WITH LEE RE DISCLOSURE STATEMENT (.1); REVISE SCHEDULING ORDER (.1); CORRESPOND WITH FBR AND CHAMBERS RE COMBINED HEARING ISSUES (.2); CORRESPOND WITH FBR RE LIQUIDATION ANALYSIS (.2); DRAFT SAME (1.0); REVIEW CLAIMS (.3); [REDACTED] (.3); TELEPHONE CONFERENCE WITH LS RE PLAN ISSUES (.2); CORRESPOND WITH NFM RE SERVICE ISSUES (.1).	2.50 Hrs
12/14/21	FBR	REVIEW AND REVISE COMBINED DISCLOSURE STATEMENT AND CONFIRMATION HEARING MOTION	1.40 Hrs
12/14/21	FBR	REVIEW AND REVISE LIQUIDATION ANALYSIS LANGUAGE	0.40 Hrs

Re: CHAPTER 11

12/15/21	CY	TELEPHONE CONFERENCE WITH CHAMBERS RE COMBINED HEARING PROCESS (.2); REVISE MOTION AND ORDER (.8); TELEPHONE CONFERENCE WITH FBR RE SAME (.2); REVISE LIQUIDATION ANALYSIS (.3); TELEPHONE CONFERENCE WITH LEE RE SAME (.3); REVISE PLAN (1.0); REVISE DISCLOSURE STATEMENT (1.8); [REDACTED] CORRESPOND WITH LEE RE SAME (.2); CORRESPOND WITH NFM RE FILING AND SERVICE OF MOTION (.5);	5.70 Hrs
12/15/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.60 Hrs
12/15/21	FBR	REVIEW OF (FINAL) PLAN FOR FILING	1.20 Hrs
12/15/21	FBR	REVIEW AND REVISE DISCLOSURE STATEMENT (FINAL) FIOR FILING	1.30 Hrs
12/15/21	FBR	REVIEW AND REVISE MOTION FOR COMBINED HEARING ON PLAN AND DISCLOSURE STATEMENT	1.10 Hrs
12/15/21	FBR	TELEPHONE CONFERENCE WITH LEE RE COMMENTS ON PLAN AND DISCLOSURE STATEMENT	0.40 Hrs
12/15/21	NFM	PREPARE AND ELECTRONICALLY FILE PLAN (.7); PREPARE AND ELECTRONICALLY FILE DISCLOSURE STATEMENT (.8); PREPARE AND ELECTRONICALLY FILE MOTION TO APPROVE DS (.7); PREPARE AND SERVE PLAN, DS AND MOTION TO APPROVE SAME (.8)	3.00 Hrs
12/16/21	NFM	DRAFT COS FOR COMBINED MOTION, PLAN, DS AND BID PROCEDURES ORDER (.5); ELECTRONICALLY FILE SAME (.2)	0.70 Hrs
12/20/21	CY	REVISE BALLOTS AND NOTIFICATIONS (1.0); CORRESPOND WITH FBR RE PLAN (.1).	1.10 Hrs
12/22/21	LS	REVIEW D.S.	0.40 Hrs
12/28/21	CY	REVIEW RESERVATION OF RIGHTS.	0.10 Hrs
12/28/21	CY	CORRESPOND WITH FBR RE DS HEARING.	0.20 Hrs
12/28/21	LS	REVIEW RESERVATION OF RIGHTS RE D.S. & CONFIRMATION	0.10 Hrs
12/29/21	CY	CORRESPOND WITH FBR RE DISCLOSURE STATEMENT HEARING (.1); TELEPHONE CONFERENCE WITH FBR RE REVISIONS TO DISCLOSURE STATEMENT (.2); [REDACTED] (.2); REVISE DISCLOSURE STATEMENT AND PLAN (3.9); CORRESPOND WITH LEE RE SAME (.2); REVISE BALLOTS (.3).	4.90 Hrs
12/30/21	CY	REVISE DISCLOSURE STATEMENT.	0.20 Hrs
12/30/21	CY	TELEPHONE CONFERENCES WITH FBR, LS, AND SE RE DEVELOPMENT MOTIONS.	0.40 Hrs
12/30/21	SE	COMMENCE REVIEW OF MOTION TO TERMINATE EXCLUSIVITY AND RELATED EXHIBITS (3.8); COMMENCE PREPARING RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (5,2)	9.00 Hrs
12/31/21	SE	DRAFT, REVIEW AND REVISE RESPONSE TO RENEWED MOTION TO TERMINATE EXCLUSIVITY (3.7); CALL WITH F. RINGEL RE SAME (.5)	4.20 Hrs

Re: CHAPTER 11

01/01/22	CY	CORRESPOND WITH FBR RE PLAN AND DISCLOSURE STATEMENT.	0.20 Hrs
01/01/22	SE	REVIEW NOVEMBER 16TH TRANSCRIPT IN CONNECTION WITH RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (.6); REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (1.8)	2.40 Hrs
01/02/22	CY	REVISE PLAN AND DISCLOSURE STATEMENT (.9); CORRESPOND WITH FBR RE SAME (.1).	1.00 Hrs
01/02/22	SE	DRAFT, REVIEW AND REVISE RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY (7.6); REVIEW CASE LAW IN CONNECTION WITH RESPONSE (.2)	7.80 Hrs
01/03/22	CY	CORRESPOND WITH FBR RE BALLOTS (.2); [REDACTED] (.3); CORRESPOND WITH FBR RE SAME (.3); [REDACTED] (.2); REVISE PLAN AND DS (1.7); CORRESPOND WITH NFM RE SOLICITATION (.1).	2.80 Hrs
01/03/22	FBR	REVIEW AND REVISE FINAL REVISIONS TO AMENDED PLAN (1.3) AND AMENDED DISCLOSURE STATEMENT (1.7)	3.00 Hrs
01/03/22	FBR	REVIEW AND REVISE DISCLOSURE STATEMENT (FINAL REVISIONS)	1.40 Hrs
01/03/22	FBR	REVIEW AND REVISE PLAN OF REORGANIZATION	1.20 Hrs
01/03/22	LS	REVIEW DEVELOPMENT PROPOSED PLAN	0.30 Hrs
01/03/22	NFM	REVIEW BALLOTS AND NON-VOTING NOTIFICATION (.6); PREPARE AND ELECTRONICALLY FILE AMENDED PLAN AND DS WITH REDLINES (1.0)	1.60 Hrs
01/05/22	CY	TELEPHONE CONFERENCE WITH FBR RE DS/PLAN REVISIONS (.2); REVISE SAME (1.2); CORRESPOND WITH NFM RE SOLICITATION (.3); SUBMIT REVISED PLAN AND DS (.3).	2.00 Hrs
01/05/22	FBR	REVIEW AND REVISE DISCLOSURE STATEMENT AND PLAN (.8), DISCLOSURE STATEMENT ORDER (0.3), INTERIM COMP ORDER (0.3)	1.40 Hrs
01/06/22	CY	REVISE BALLOTS AND NOTICES (.6); CORRESPOND WITH NFM RE SAME (.2); SEND MC BALLOT (.1).	0.90 Hrs
01/06/22	NFM	REVIEW AND PREPARE SERVICE LIST FOR BALLOTS AND SOLICITATION MATERIALS (.8); PREPARE AND ELECTRONICALLY FILE AMENDED PLAN AND AMENDED DS (1.5); PREPARE AND SERVE SOLICITATION MATERIALS (1.0); ELECTRONICALLY FILE COS FOR RESPONSE TO RENEWED MOTION TO TERMINATE EXCLUSIVITY (.2)	3.50 Hrs
01/07/22	CY	CORRESPOND WITH NFM RE SOLICITATION.	0.10 Hrs
01/07/22	NFM	DRAFT AND REVIEW COS FOR SOLICITATION MATERIALS	0.50 Hrs
01/10/22	NFM	DRAFT, PREPARE, AND ELECTRONICALLY FILE COS FOR SOLICITATION MATERIALS (1.0); ELECTRONICALLY FILE AND E-MAIL NOTICE OF STALKING HORSE (.5)	1.50 Hrs
01/11/22	NFM	PREPARE AND SEND STALKING HORSE NOTICE TO JUDGE	0.20 Hrs
01/12/22	NFM	RETRIEVE PAYOFF NOTICE FROM PACER AND DISTRIBUTE SAME (.2)	0.20 Hrs

Re: CHAPTER 11

01/24/22	AMG	TELEPHONE CONFERENCE WITH FRED RE PLAN, SALE AND CLOSING CASE	0.40 Hrs	
01/25/22	CY	CORRESPOND WITH FBR RE PLAN.	0.10 Hrs	
01/28/22	AMG	TELEPHONE CONFERENCE WITH FRED RE PLAN AND VOTING ISSUES	0.40 Hrs	
01/28/22	CY	TELEPHONE CONFERENCE WITH LS RE AMENDED PLAN (.2); TELEPHONE CONFERENCE WITH FBR RE SAME (.3) REVISE SAME (1.4).	1.90 Hrs	
01/28/22	FBR	REVIEW AND REVISE PLAN OF REORGANIZATION (.8) PREPARATION OF OBJECTION TO SUPPLEMENT (1.8)	2.60 Hrs	
01/28/22	LS	REVIEW REDLINE PLAN	0.90 Hrs	
01/28/22	LS	TELEPHONE CONFERENCE WITH CY TO REVIEW PLAN	1.00 Hrs	
01/28/22	NFM	ELECTRONICALLY FILE NOTICE OF ADJOURNMENT OF CONFIRMATION HEARING	0.30 Hrs	
01/29/22	CY	REVISE AMENDED PLAN (.2); CORRESPOND WITH FBR RE SAME (.2).	0.40 Hrs	
01/30/22	CY	REVISE PLAN.	0.30 Hrs	
01/31/22	CY	TELEPHONE CONFERENCE WITH LS RE PLAN AND PAYOFF OBJECTION (.3); REVISE CONFIRMATION ORDER (.4).	0.70 Hrs	
01/31/22	FBR	REVIEW AND REVISE PLAN	0.80 Hrs	
01/31/22	FBR	TELEPHONE CONFERENCE WITH LEE RE REVISIONS TO PLAN	0.30 Hrs	
01/31/22	LS	TELEPHONE CONFERENCE WITH CY TO REVIEW PLAN 2X	0.20 Hrs	
01/31/22	LS	TELEPHONE CONFERENCE WITH FBR RE PLAN REVISIONS, CASE CONFERENCE AND PRESENTATION RE DESIGNATION OF VOTES & FUNDING ISSUES	0.10 Hrs	
01/31/22	LS	REVIEW REDLINE PLAN	0.10 Hrs	
01/31/22	LS	REVIEW EMAILS RE PLAN REVISIONS	0.10 Hrs	
01/31/22	LS	EMAIL TO FBR & CY RE PLAN COMMENTS	0.10 Hrs	
02/01/22	AMG	TELEPHONE CONFERENCE WITH FRED RE COURT HEARING AND PLAN STATUS	0.30 Hrs	
02/01/22	FBR	REVIEW AND REVISE PLAN RE SUGGESTIONS MADE BY JUDGE BECKERMAN AT HEARING	1.20 Hrs	
03/10/22	CY	CORRESPOND WITH LS RE CONFIRMATION BRIEF.	0.10 Hrs	
PLAN AND DISCLOSURE STATEMENT Totals			130.60 Hrs	\$69,039.50

DISMISSAL, VENUE, ABSTENTION & WITHDRAWAL

10/20/21	LS	REVIEW TRANSCRIPT OF HEARING/RULING ON MTD	1.10 Hrs
11/02/21	CY	TELEPHONE CONFERENCE WITH SE RE SECOND MOTION TO DISMISS (.1); REVIEW SAME (.3).	0.40 Hrs
11/02/21	LS	TELEPHONE CONFERENCE WITH CY RE SECOND MTD AND OPPOSITION	0.20 Hrs
11/03/21	LS	REVIEW 2ND MOTION TO DISMISS	0.80 Hrs

Re: CHAPTER 11

11/03/21	LS	DISC WITH CY RE 2ND MOTION TO DISMISS	0.20 Hrs
11/03/21	LS	TELEPHONE CONFERENCE WITH CY RE FIRST MOTION TO DISMISS	0.10 Hrs
11/03/21	LS	TELEPHONE CONFERENCE WITH FBR RE 2ND MOTION TO DISMISS AND PREPARING RESPONSE	0.10 Hrs
11/03/21	LS	REVIEW MTD TRANSCRIPT RE EQUITY & EXERCISE OF PLEDGE	0.40 Hrs
11/03/21	LS	REVIEW FIRST MTD	0.20 Hrs
11/04/21	LS	TELEPHONE CONFERENCE WITH CY 3X RE COUNTER-STATEMENT OF ISSUES, OPP TO 2ND MTD AND PLAN PREP	0.40 Hrs
11/04/21	LS	COMPARE FIRST AND SECOND MOTIONS TO DISMISS	0.50 Hrs
11/04/21	LS	REVIEW 2ND MOTION TO DISMISS	0.70 Hrs
11/04/21	LS	REVIEW OPP TO INITIAL MTD (LENDER & DEBTOR)	0.50 Hrs
11/05/21	LS	REVIEW TRANSCRIPTS OF MTD, MOTION TO RECONSIDER AND 2004 EXAMINATIONS FOR PREP OF OBJECTION TO 2ND MTD	1.20 Hrs
11/05/21	LS	PREPARE OBJECTION TO 2ND MTD	0.80 Hrs
11/05/21	NFM	REVIEW, CITE CHECK AND QUOTE CHECK CASES AND TRANSCRIPT CITES IN RESPONSE TO MOTION TO TERMINATE EXCLUSIVITY	2.00 Hrs
11/07/21	LS	REVIEW 2ND MOTION TO DISMISS	0.70 Hrs
11/07/21	LS	PREPARE OPP TO 2ND MTD	3.60 Hrs
11/07/21	LS	REVIEW TRANSCRIPT OF MTD, MTR FOR SUPPORT/INCLUSION IN OPP TO 2ND MTD	0.90 Hrs
11/08/21	CY	REVIEW OBJECTION TO EXCLUSIVITY TERMINATION (.6); PREPARE DECLARATION RE SAME (.2).	0.80 Hrs
11/08/21	FBR	REVIEW AND REVISE CHANGES TO MOTION TO DISMISS 2ND MOTION [REDACTED]	1.20 Hrs
11/08/21	FBR	REVIEW AND REVISE EDITS OF OPPOSITION TO SECOND MOTION TO DISMISS	0.50 Hrs
11/08/21	NFM	REVIEW AND REVISE RESPONSE RE MOTION TO TERMINATE EXCLUSIVITY (.8); DRAFT DECLARATION FOR SAME (.5)	1.30 Hrs
11/09/21	CY	REVIEW OBJECTION TO MOTION TO DISMISS (.3); TELEPHONE CONFERENCE WITH LS RE SAME (.1).	0.40 Hrs
11/09/21	LS	REVIEW REVISED OPP TO 2ND MTD	0.70 Hrs
11/09/21	LS	EMAIL TO FBR RE REVISIONS TO OPP TO 2ND MTD	0.10 Hrs
11/09/21	LS	TELEPHONE CONFERENCE WITH FBR RE OPP TO 2ND MTD, VARIOUS OBJECTIONS/RESPONSES FOR ECF AND NOV. 16 HEARINGS	0.20 Hrs
11/09/21	NFM	PREPARE AND ELECTRONICALLY FILE DEBTOR'S OBJECTION TO SECOND MOTION TO DISMISS AND DECLARATION (1.0); SERVE SAME (.3)	1.30 Hrs

Re: CHAPTER 11

11/18/21	CY	REVIEW ORDER DENYING SECOND MOTION TO DISMISS.	0.10 Hrs
11/23/21	CY	REVIEW MOTION FOR STRUCTURED DISMISSAL.	0.30 Hrs
11/23/21	LS	REVIEW MOTION FOR PAYOFF/STRUCTURAL DISMISSAL	0.30 Hrs
11/23/21	SE	REVIEW DEVELOPMENT'S MOTION TO DISMISS CASE	1.70 Hrs
11/24/21	CY	CORRESPOND WITH SE RE STRUCTURED DISMISSAL MOTION (.1); RESEARCH RE SAME (1.0).	1.10 Hrs
11/24/21	SE	TEL CONF WITH F. RINGEL RE DRAFTING OBJECTION TO DEVELOPMENT'S MOTION TO DISMISS CASE VIA STRUCTURED DISMISSAL	0.30 Hrs
11/24/21	SE	REVIEW NOVEMBER 16TH HEARING TRANSCRIPT AND ANALYZE ISSUES RAISED THEREIN FOR RESPONSE TO MOTION TO DISMISS CASE	1.90 Hrs
11/24/21	SE	COMMENCE DRAFTING OBJECTION TO MOTION TO DISMISS CASE	3.20 Hrs
11/25/21	SE	DRAFT, REVIEW AND REVISE RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (2.2)	2.20 Hrs
11/26/21	CY	RESEARCH RE STRUCTURED DISMISSAL (1.6); CORRESPOND WITH FBR RE SAME (.3).	1.90 Hrs
11/26/21	SE	DRAFT, REVIEW AND REVISE RESPONSE TO MOTION FOR STRUCTURED DISMISSAL	1.50 Hrs
11/26/21	SE	EMAILS TO AND FROM C. YEE RE MOTION FOR STRUCTURED DISMISSAL (.1); EMAIL TO AND FROM F. RINGEL RE SAME	0.30 Hrs
11/26/21	SE	REVIEW TRANSCRIPT OF PRIOR HEARING AND CASE LAW IN CONNECTION WITH DRAFTING RESPONSE TO MOTION FOR STRUCTURED DISMISSAL	1.20 Hrs
11/27/21	CY	CORRESPOND WITH SE AND FBR RE STRUCTURED DISMISSAL.	0.20 Hrs
11/28/21	CY	CORRESPOND WITH SE RE STRUCTURED DISMISSAL.	0.10 Hrs
11/28/21	SE	CONTINUE DRAFTING AND REVISING RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (7.6)	7.60 Hrs
11/28/21	SE	RESEARCH RE SECTION 107(B) IN CONNECTION WITH RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (.4)	0.40 Hrs
11/29/21	CY	TELEPHONE CONFERENCE WITH LS RE STRUCTURED DISMISSAL.	0.10 Hrs
11/29/21	FBR	REVIEW OF OPPOSITION TO MOTION FOR STRUCTURED DISMISSAL	0.80 Hrs
11/29/21	FBR	TELEPHONE CONFERENCE WITH STEVE EICHEL [REDACTED]	0.80 Hrs
11/29/21	LS	TELEPHONE CONFERENCE WITH SE RE RESPONSE TO SDM	0.20 Hrs
11/29/21	LS	REVIEW RESPONSE TO SDM	0.30 Hrs
11/29/21	SE	TEL CONF WITH FRED RINGEL RESPONSE TO MOTION TO PAY CLAIMS AND STRUCTURALLY DISMISS BANKRUPTCY CASE	0.40 Hrs

Re: CHAPTER 11

11/30/21	FBR	TELEPHONE CONFERENCE WITH GREG ZIPES REGARDING STRUCTURE DISMISSAL MOTION AND DEBTORS POSITION ON SAME	0.70 Hrs
11/30/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.60 Hrs
11/30/21	FBR	REVIEW AND REVISE DEBTOR'S OPPOSITION TO MOTION FORN STRUCTURED DISMISSAL	5.00 Hrs
11/30/21	LS	REVIEW MOTION FOR PAYOFF OF LENDER AND STRUCTURED DISMISSAL	1.10 Hrs
11/30/21	LS	PREPARE NOTES RE ITEMS TO INCLUDE IN RESPONSE TO STRUCTURED DISMISSAL MOTION	0.30 Hrs
11/30/21	LS	REVIEW DRAFT RESPONSE TO MOTION FOR PAYOFF OF LENDER AND STRUCTURED DISMISSAL	0.80 Hrs
11/30/21	NFM	RETRIEVE CASES CITED IN DEBTOR'S RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (1.0); REVIEW, CITE CHECK AND QUOTE CHECK SAME (3.0)	4.00 Hrs
12/01/21	CY	CORRESPOND WITH LS RE STRUCTURED DISMISSAL (.2); CORRESPOND WITH FBR RE STRUCTURED DISMISSAL ISSUES (.6).	0.80 Hrs
12/01/21	FBR	REVIEW AND REVISE OPPOSITION TO STRUCTURED DISMISSAL	0.50 Hrs
12/01/21	FBR	REVIEW OF DRAFT OF STRUCTURED DISMISSAL RESPONSE	1.00 Hrs
12/01/21	FBR	TELEPHONE CONFERENCE WITH LS REGARDING CHARGES TO STRUCTURED DISMISSAL DRAFT	0.50 Hrs
12/01/21	FBR	PREPARATION OF EMAIL TO BUCHWALD TRANSMITTING DRAFT OF RESPONSE TO STRUCTURED DISMISSAL MOTION	0.10 Hrs
12/01/21	FBR	REVIEW AND REVISE RESPONSE TO STRUCTURED DISMISSAL MOTION	0.50 Hrs
12/01/21	LS	REVIEW RESPONSE TO SDM	0.90 Hrs
12/01/21	LS	REVIEW STRUCTURED DISMISSAL MOTION	0.40 Hrs
12/01/21	LS	REVIEW AND REVISE DRAFT RESPONSE TO STRUCTURED DISMISSAL MOTION	5.70 Hrs
12/01/21	LS	TELEPHONE CONFERENCE WITH FBR 2X RE RESPONSE TO SDM AND REVISIONS TO RESPONSE	0.60 Hrs
12/01/21	LS	EMAILS WITH FBR RE REVISIONS TO RESPONSE TO SDM	0.20 Hrs
12/01/21	LS	EMAILS WITH CY & FBR RE JEVID, KG WINDOWN AND STRUCTURED DISMISSAL	0.20 Hrs
12/01/21	LS	REVIEW REVISED EXHIBIT IN SUPPORT OF STRUCTURED DISMISSAL	0.20 Hrs
12/01/21	LS	TELEPHONE CONFERENCE WITH SE RE REVISIONS TO RESPONSE TO SDM	0.10 Hrs
12/01/21	LS	DISCUSSION TO NFM RE UPDATING CITATIONS IN RESPONSE TO SDM	0.10 Hrs

Re: CHAPTER 11

12/01/21	NFM	REVIEW AND QUOTE CHECK MARKUP OF RESPONSE TO PAYOFF/DISMISSAL MOTION (1.3); MAKE CHANGES TO SAME FOR STEVEN EICHEL (.5); RETRIEVE AMENDED EXHIBIT C TO PAYOFF MOTION AND DISTRIBUTE SAME (.2)	2.00 Hrs
12/01/21	SE	CALL WITH N. MEYERS RE CHANGES HE HAD TO RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (.1); REVIEW PROPOSED CHANGES TO RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (.1); REVIEW REVISIONS TO RESPONSE TO MOTION FOR STRUCTURED DISMISSAL (.4)	0.60 Hrs
12/02/21	CY	REVISE OBJECTION TO STRUCTURED DISMISSAL (1.1); REVIEW UST OBJECTION TO SAME (.2).	1.30 Hrs
12/02/21	FBR	RECEIVED AND REVIEW OF EMAIL SPEL FOGEL REGARDING CALL ON PAYOFF	0.10 Hrs
12/02/21	FBR	TELEPHONE CONFERENCE WITH DOUG SPELFOGEL, JOE MOLDOVAN RE STRUCTURED DOISSISSAL	0.50 Hrs
12/02/21	FBR	TELEPHONE CONFERENCE WITH [REDACTED]	0.40 Hrs
12/02/21	FBR	REVIEW OF US TRUSTEE'S OBJECTION TO STRUCTURED DISMISSAL	0.50 Hrs
12/02/21	FBR	REVIEW OF LENDERS OBJECTION TO STRUCTURED DISMISSAL	0.40 Hrs
12/02/21	LS	TELEPHONE CONFERENCE WITH FBR 2X RE RESPONSE TO SDM 2X	0.40 Hrs
12/02/21	LS	TELEPHONE CONFERENCE WITH CY RE RESPONSE TO SDM	0.10 Hrs
12/02/21	LS	REVIEW DOCKET, MTD 1 AND 2, MTR AND TRANSCRIPTS FOR CITATIONS IN RESPONSE TO STRUCTURED DISMISSAL MOTION	2.10 Hrs
12/02/21	LS	REVIEW JOINDER - MOSKOVITS AND LICHTENSTEIN TO SDM	0.20 Hrs
12/02/21	NFM	PREPARE AND ELECTRONICALLY FILE RESPONSE TO MOTION FOR PAYOFF/DISMISSAL (1.0); SERVE SAME (.5); RETRIEVE JOINDER AND UST OBJECTION RE SAME OFF PACER AND DISTRIBUTE SAME (.5)	2.00 Hrs
12/03/21	FBR	REVIEW OF OBJECTION TO [REDACTED] BID PROCEDURES MOTION	0.70 Hrs
12/03/21	FBR	TELEPHONE CONFERENCE WITH LS RE OUTLINE RESPONSE TO OBJECTION	0.40 Hrs
12/03/21	LS	REVIEW STRUCTURED DISMISSAL MOTION	0.40 Hrs
12/03/21	LS	REVIEW OBJECTIONS TO SDM	0.50 Hrs
12/03/21	SE	REVIEW UST'S OBJECTION TO MOTION TO STRUCTURALLY DISMISS CASE (.2)	0.20 Hrs
12/06/21	CY	REVIEW REPLY TO DISMISSAL OBJECTION.	0.30 Hrs
12/06/21	FBR	REVIEW OF RESPONSE TO STRUCTURE DISMISSAL MOTION	0.60 Hrs
12/06/21	LS	REVIEW OMNIBUS REPLY TO OBJECTIONS TO SDM	0.90 Hrs
12/06/21	SE	REVIEW DEVELOPMENT'S OMNIBUS REPLY TO RESPONSES TO MOTION TO STRUCTURALLY DISMISS BANKRUPTCY CASE (.5)	0.50 Hrs
12/07/21	CY	RESEARCH RE STRUCTURED DISMISSAL ISSUES (.6); TELEPHONE CONFERENCE WITH FBR AND LS RE SAME (.6).	1.20 Hrs

Re: CHAPTER 11

12/07/21	FBR	REVIEW OF RESPONSE TO MOTION FOR STRUCTURED DISMISSAL	1.20 Hrs	
12/08/21	CY	CORRESPOND WITH LS RE STRUCTURED DISMISSAL.	0.20 Hrs	
12/08/21	FBR	TELEPHONE CONFERENCE WITH DOUG SPELLFOGEL RE STRUCTURED DISMISSAL	1.00 Hrs	
12/08/21	FBR	PREPARATION OF CALCULATIONS FOR STRUCTURED DISMISSAL OPOOSITION	0.60 Hrs	
12/08/21	FBR	PREPARATION OF HEARING ON MOTION FOR STRUCTURED DISMISSAL AND BIDDING PROCEDURES	4.10 Hrs	
12/09/21	CY	TELEPHONE CONFERENCE WITH FBR RE STRUCTURED DISMISSAL HEARING.	0.10 Hrs	
12/09/21	FBR	LITIGATION / COURT APPEARANCE HEARING ON STRUCTURE DISMISSAL MOTION AND BID ORICEDURES MOTION	3.20 Hrs	
12/20/21	FBR	TELEPHONE CONFERENCE WITH DOUG SPELFOGEL RE STRUCTURED DISMISSAL PROPOSAL	0.80 Hrs	
02/10/22	LS	REVIEW RENEWED MOTION TO DISMISS	0.60 Hrs	
DISMISSAL, VENUE, ABSTENTION & WITHDRAWAL Totals			100.60 Hrs	\$57,690.50
TOTAL FEES				\$610,472.00

LEGAL SERVICES SUMMARY

GREENE, A. MITCHELL	0.90 Hrs	0 /hr	No Charge
MEYERS, NATHANAEL F.	6.50 Hrs	0 /hr	No Charge
RINGEL, FRED B.	0.00 Hrs	0 /hr	No Charge
SASLOFF, ROBERT M.	0.70 Hrs	0 /hr	No Charge
SCHWARTZ, LORI	5.10 Hrs	0 /hr	No Charge
YEE, CLEMENT	2.70 Hrs	0 /hr	No Charge
MEYERS, NATHANAEL F.	139.90 Hrs	250 /hr	34,975.00
MENASCHÉ, NICHOLAS M.	3.50 Hrs	475 /hr	1,662.50
YEE, CLEMENT	177.00 Hrs	475 /hr	84,075.00
YEE, CLEMENT	44.90 Hrs	495 /hr	22,225.50
SASLOFF, ROBERT M.	0.20 Hrs	545 /hr	109.00
THOMAS, PHILIP H.	2.70 Hrs	550 /hr	1,485.00
SCHWARTZ, LORI	150.50 Hrs	570 /hr	85,785.00
EICHEL, STEVEN	150.00 Hrs	590 /hr	88,500.00
SCHWARTZ, LORI	107.30 Hrs	600 /hr	64,380.00
RINGEL, FRED B.	191.60 Hrs	750 /hr	143,700.00
GREENE, A. MITCHELL	1.00 Hrs	775 /hr	775.00
GREENE, A. MITCHELL	2.10 Hrs	800 /hr	1,680.00

ROBINSON BROG LEINWAND GREENE GENOVESE & GLUCK P.C.

Re: CHAPTER 11

RINGEL, FRED B.	101.40 Hrs	800 /hr	81,120.00
	<hr/> 1,088.00 Hrs		<hr/> 610,472.00